



CENTRE FOR FOOD SAFETY AND AGRICULTURAL RESEARCH (CEFSAR)

LEGISLATIVE SUBMISSION

A case for the outright withdrawal of the Nutritionists Registration Council of Nigeria Bill, 2025

(HB.2659)

20 October, 2026

A FORMAL MEMORANDUM TO THE HOUSE OF REPRESENTATIVES COMMITTEE ON NUTRITION AND FOOD SECURITY; AND A NATIONAL POSITION PAPER ON A BILL FOR AN ACT TO PROVIDE FOR THE ESTABLISHMENT OF THE NUTRITIONISTS REGISTRATION COUNCIL OF NIGERIA AND FOR RELATED MATTERS (HB.2659) SUBMITTED TO THE PUBLIC HEARING HELD ON TUESDAY 20TH OCTOBER, 2026 AT THE CONFERENCE HALL 028, HOUSE OF REPRESENTATIVES NEW BUILDING, NATIONAL ASSEMBLY, ABUJA, AT 10:00 AM

NIGERIA'S FOOD IS NOT FOR SALE, AND ITS NUTRITIONAL SOVEREIGNTY IS NOT FOR SURRENDER

Protecting Indigenous Food Knowledge, Academic Freedom, Institutional Autonomy, Consumer Rights and National Food Sovereignty Against Regulatory Monopolisation and Commercial Capture

Submitted to: National Assembly of the Federal Republic of Nigeria House of Representatives Committee on Nutrition and Food Security - Public Hearing On A Bill For An Act To Provide For The Establishment Of The Nutritionists Registration Council Of Nigeria And For Related Matters (Hb.2659) Held On Tuesday 20Th October, 2026

Submitted by: Centre for Food Safety and Agricultural Research (CEFSAR)

Date: 20 October, 2026

1. Executive Declaration: a Nation Must Not Legislate Away its Food Sovereignty

The Centre for Food Safety and Agricultural Research (CEFSAR) unequivocally rejects the Nutritionists Registration Council of Nigeria Bill, 2025, in its present form and calls upon the National Assembly to withdraw it from further legislative consideration.

Our opposition is neither a rejection of professional nutrition science nor a challenge to legitimate standards of professional competence, ethics and public protection.

It is, instead, a defence of a fundamental national principle:

Nutrition is too deeply embedded in the biological survival, cultural identity, agricultural economy, indigenous knowledge and sovereign rights of the Nigerian people to be surrendered to the sweeping authority of a single professional interest group.

Nigeria's nutritional heritage was not invented by a professional association. It did not originate in a modern laboratory, an international donor programme or a foreign commercial institution.

Long before modern professional nutrition emerged, Nigerian communities had developed sophisticated systems of food cultivation, preservation, fermentation, preparation, combination, distribution and intergenerational nutritional education.

These systems constitute a living body of knowledge. They are neither obsolete nor the exclusive property of any contemporary profession.

The Tiv farmer who understands the cultivation, storage and preparation of yam and indigenous vegetables; the Hausa farmer and food processor who understands the cultivation of beans/cowpeas, onions, carrots cabbage and other vegetables, and preserves millet and sorghum through traditional fermentation; the Yoruba household that transmits the processing knowledge of maize, cassava,

traditional herbs and leafy vegetables; and the Igbo communities that sustain traditional legume, tuber and vegetable food systems are all custodians of Nigeria's nutritional heritage.

Their knowledge must be open to scientific examination and improvement, but it must never become unlawful merely because it exists outside the membership of a newly established professional council.

The Nigerian state may regulate identifiable professional services WHERE NECESSARY to protect public health. **It must not confer an undefined monopoly over the meaning, teaching, interpretation or communication of nutrition.**

The distinction is decisive.

A council may regulate the professional conduct and protected titles of its members. It cannot, and should not legitimately claim ownership of Nigeria's nutrition, food culture or national food sovereignty.

2. The Fundamental Error: Confusing Professional Regulation With National Control of Nutrition

CEFSAR recognises that a legitimate regulatory framework may protect the public against fraudulent professional qualifications, clinical malpractice, misrepresentation and unethical professional conduct.

However, professional regulation must have clearly defined boundaries.

The proposed Bill, particularly sections 3, 17–23 and 27–30 as identified in CEFSAR’s legislative analysis, raises concerns about authority over educational institutions, curriculum development, examinations, recognition of qualifications, professional registration and sanctions.

These provisions risk creating an additional regulatory centre with influence extending beyond the reasonable boundaries of professional membership.

There are three fundamentally different matters which the legislation must not confuse:

- Professional association governance: Membership, professional ethics, continuing development, disciplinary standards and representation of association members.
- Regulation of specified professional services: Clearly identified reserved services, competence requirements and protected professional titles, where Parliament establishes a demonstrable public-interest justification.
- Governance of national nutrition and food systems: Public policy, food safety, agricultural production, traditional food knowledge, academic research, public education, cultural food practices and consumer rights.

The first may properly belong to a professional association. The second may justify carefully circumscribed statutory regulation. The third belongs to a broad ecosystem of constitutional institutions, statutory agencies, universities, farmers, communities, scientists, consumers and public authorities.

The proposed Council must not be allowed to collapse these three distinct domains into one concentration of power.

Nigeria already possesses legally established authorities responsible for tertiary education, professional training, food safety, public health, agricultural research, product standards and agricultural/environmental biosafety.

Creating an additional authority without expressly protecting existing mandates risks duplicative licensing, contradictory institutional decisions, increased educational costs and unnecessary barriers to knowledge dissemination.

CEFSAR therefore proposes that, should the proponents wish to organise their profession, they pursue a narrowly constituted professional registration or association-governance framework, without any implied general jurisdiction over Nigeria's food and nutrition systems.

A professional body may seek legal recognition. It cannot reasonably demand an exclusive licence to determine what Nigerians may know, teach, research, cultivate, consume or communicate about food.

3. Nigeria's Food and Nutrition Emergency: What the Evidence - EVEN THEIR EVIDENCE, Reveals

Nigeria is facing a substantial food and nutrition crisis. This is the proper starting point for any credible legislative intervention.

The National Assembly must ask whether the proposed law directly addresses the causes of hunger, poor dietary

diversity, food contamination, nutritional deficiency and the declining affordability of wholesome food.

The evidence establishes the urgency of the crisis.

Projected acute food insecurity, 2025 lean season

33.1 million

People, according to the November 2024 Cadre Harmonisé projection

Children under five experiencing stunting

40%

2024 Nigeria Demographic and Health Survey

Women aged 15–49 with anaemia

47%

2024 Nigeria Demographic and Health Survey

Women meeting minimum dietary diversity

30%

2024 Nigeria Demographic and Health Survey

These figures may appear as mere statistics, generated mostly by International NGOs, and not primarily by our national or sub-national governmental MDAs. Yet, they can be showcased to present a picture of the nutritional circumstances of millions of Nigerian households.

The 2024 Nigeria Demographic and Health Survey further documented substantial geographic inequality in childhood

stunting, ranging from approximately 12% in Rivers State to 65% in Katsina State.

This geographic disparity is particularly important. It demonstrates that Nigeria's nutritional challenges are not uniform and cannot be adequately addressed through a single centrally determined professional model detached from local realities.

Food availability, household purchasing power, sanitation, agricultural conditions, maternal health, disease burden, education and culturally appropriate dietary practices all influence nutritional outcomes.

The World Food Programme's own July 2025 warning also described nearly 31 million Nigerians experiencing acute hunger, alongside serious disruptions to humanitarian food assistance.

These estimates relate to different reporting periods and should not be treated as directly interchangeable. Nevertheless, their combined significance is unmistakable.

Nigeria's primary nutrition emergency is not the absence of another professional registration council. It is the inability of millions of citizens to obtain sufficient, safe, diverse, affordable and nutritious food.

CEFSAR submits that legislation which concentrates professional power without materially improving these conditions risks addressing an administrative symptom while neglecting the national crisis.

The relevant questions for Parliament are therefore unavoidable:

Why should Nigeria prioritise an expansive new licensing regime over strengthening food laboratories, nutrition surveillance, indigenous crop production, household dietary diversity and agricultural extension?

How will the proposed Council measurably reduce childhood stunting, maternal anaemia, foodborne disease or household food insecurity?

Where is the published regulatory-impact assessment establishing that this particular institutional arrangement offers greater public benefit than improving existing structures?

Unless the proponents can answer these questions with independently verifiable evidence, the case for this Bill remains fundamentally inadequate.

4. Nutrition Is Indigenous, Historical, Ecological and Culturally Situated

Food is simultaneously a biological necessity, an agricultural product, an ecological relationship and an expression of culture.

Nutrition science examines the interactions among foods, nutrients, human physiology, health and disease. But nutritional knowledge is also generated through food systems and cultural experience.

These dimensions must complement one another.

Many authorities recognize that Indigenous Peoples' food systems embody accumulated ecological knowledge,

biodiversity conservation, adaptive production practices and cultural heritage.

A Nigerian contribution included in 2024 likewise described indigenous food systems as important foundations for biodiversity conservation, food security and sustainability.

This evidence supports an important principle: modern nutritional science should investigate, preserve and strengthen traditional food knowledge, rather than displace its custodians.

4.1 The Nigerian Food Heritage Is a National Scientific Resource

Nigeria’s many nationalities and communities possess distinct but interconnected food systems.

Cultural and ecological context	Examples of traditional food knowledge
Tiv and other Middle Belt communities	Yam, rice, sesame, legumes, indigenous vegetables, grain processing and locally adapted food combinations
Hausa and Fulani communities	Millet, sorghum, cowpea, fermented cereal preparations, dairy traditions and dryland food preservation
Yoruba communities	Cassava and maize fermentation, yam-based meals, leafy vegetables, locust-bean fermentation and indigenous soups

Igbo communities	Yam, cocoyam, cassava, vegetable soups, oilseed processing and traditional fermented condiments
Ijaw, Efik, Ibibio and other coastal communities	Fish preservation, seafood preparation, aquatic foods, palm-derived ingredients and root crops
Nupe, Idoma, Igala and neighbouring communities	Indigenous cereals, legumes, roots, oilseeds, fermented foods and locally adapted vegetable preparations

These examples are not exhaustive, and many foods are shared across ethnic and geographic boundaries.

The scientific value of such systems includes their potential contribution to agrobiodiversity, dietary diversity, food preservation, climate adaptation and local economic resilience.

Traditional fermentation, for example, may modify food acidity, microbial composition, sensory qualities and the bioavailability of certain nutrients. The effects depend on the organisms involved, processing conditions and food substrate. Many such traditional preparations are precisely why community knowledge and rigorous scientific investigation should work together.

Nigeria should be funding systematic studies of its traditional foods, including nutrient profiling, contaminant assessment, food microbiology, processing chemistry, bioavailability, toxicology and cultural acceptability.

It should not create unnecessary legal uncertainty for the very communities, institutions and researchers capable of advancing this work.

4.2 Indigenous Knowledge Must Not Become a Licensed Privilege

Consider the implications of broadly drafted legislation that makes professional registration a prerequisite for certain forms of nutrition teaching or advice.

Would a community agricultural extension worker require permission to explain the dietary uses of indigenous legumes?

Would a food scientist investigating traditional fermentation be exposed to professional sanctions for publicly explaining the nutritional properties of a food?

Would a women's cooperative teaching traditional food preparation fall within a restricted professional activity?

Would an independent scientist be free to question the nutritional claims made about a commercially promoted crop?

Would a community organisation be free to advise families on affordable, locally available foods?

These questions do not establish that every such activity is expressly prohibited by the Bill. Rather, they expose the danger of imprecise statutory definitions combined with extensive enforcement powers.

The law must not leave researchers, farmers, educators and communities guessing whether ordinary, legitimate activities constitute an offence.

Where criminal sanctions are proposed, precision is indispensable.

4.3 Cultural Sovereignty Is Inseparable From Food Sovereignty

The destruction of indigenous food systems need not occur through the physical removal of crops alone.

It can also occur through the gradual displacement of traditional knowledge, the marginalisation of local foods, the loss of community seed systems, the concentration of commercial food distribution and the exclusion of local voices from food-policy decisions.

This is why food sovereignty concerns more than the quantity of food available.

It includes the capacity of communities and nations to participate meaningfully in determining how food is produced, processed, distributed, researched, regulated and consumed.

Nigeria's food systems should be scientifically improved, economically strengthened and publicly protected.

They should not be reduced to a domain over which a single professional group exercises disproportionate authority.

5. Regulatory Capture: the Danger of Transferring Public Authority to Concentrated Private Interests

The risk of regulatory capture deserves serious parliamentary attention.

Regulatory capture occurs when a body established to serve the public interest becomes excessively influenced by the organisations, professions or commercial interests it is supposed to regulate.

The danger is particularly acute when regulatory authority, professional membership, standard-setting, disciplinary powers and financial dependence are concentrated within closely connected institutions.

CEFSAR's examination of the proposed Bill identifies governance provisions under section 5 and financial powers under sections 32–35 as matters requiring scrutiny.

The concerns are not that professional membership or lawful donations are inherently improper.

The concern is that a body exercising coercive public authority must possess sufficient independence from the interests that may benefit from its decisions.

A Council empowered to determine professional entry, educational recognition, practice standards and disciplinary outcomes could influence who may participate in a significant area of professional and public discourse.

If such an institution were subsequently exposed to concentrated commercial funding or influence, conflicts of

interest could arise, with dangerous implications for national food sovereignty and national security indeed.

Potential pathways include industry-funded training, sponsored research, professional conferences, educational grants, advisory appointments, standards committees and financial relationships with regulated businesses.

These are recognised categories of governance risk.

CEFSAR therefore demands that the National Assembly require public disclosure of the following before entertaining any revised proposal: the sponsoring association's principal funding sources, foreign and domestic institutional partnerships, relevant corporate donations, financial interests of proposed governing members, and any relationships with food manufacturers, agricultural biotechnology companies or commercial nutrition businesses.

Such disclosure should be accompanied by independently enforceable conflict-of-interest rules.

No organisation should simultaneously enjoy privileged influence over a regulator, benefit financially from its decisions and exercise disproportionate control over competing professional or scientific voices.

6. The GMO Question: a Legitimate National Concern That Parliament Must Investigate

The introduction, cultivation, importation, marketing and consumption of genetically modified organisms remain matters of substantial public interest in Nigeria.

They involve biosafety, food safety, human and environmental health, farmer livelihoods, intellectual-property arrangements, seed access, consumer choice, national agricultural policy, gain of function research and national sovereignty.

6.1 The Danger Of Suppressing Independent Nutritional Criticism

CEFSAR is concerned that excessively broad restrictions on who may offer nutrition-related advice could create a mechanism through which independent criticism of food products, including genetically modified products, might be discouraged.

The question is not merely whether the proponents intend such an outcome.

It is whether the law could reasonably be interpreted or administered in a manner that produces it.

For example, would an independent food scientist be free to publicly discuss uncertainties in a GMO risk assessment?

Could an agricultural, food and nutraceutical researcher like yours sincerely, advise consumers to choose conventional or indigenous crop varieties based on stated agricultural, economic, ecological or dietary considerations?

Could a consumer organisation question a manufacturer's safety claims without first obtaining professional registration?

Could CEFSAR publish independent laboratory findings and recommendations concerning a food product without seeking approval from a professional council?

These freedoms must be expressly protected.

6.2 The Case of The Available Evidence

CEFSAR hereby thus, expresses both a legitimate concern and a demonstrated fact. The absence of proof of a conspiracy does not eliminate the need for safeguards against regulatory capture.

It is entirely legitimate for Parliament to investigate whether any commercial interests stand to benefit from the proposed concentration of professional authority.

It is equally legitimate to insist that no nutrition legislation should be capable of suppressing lawful, evidence-based criticism of biotechnology products or restricting informed consumer choice.

CEFSAR's position is categorical: No law should make independent scientific scrutiny of food products contingent upon the approval of a professional group that could itself be exposed to commercial influence.

6.3 A Profound Moral Objection

CEFSAR regards any attempt to subordinate the nutritional freedom of a people to concealed commercial interests as morally indefensible.

From a research-informed ethical perspective, legislation that knowingly exploits hunger, suppresses truth or

compromises the welfare of vulnerable populations would represent a grave betrayal of public trust.

Such conduct may properly be condemned in the strongest moral language.

And the seriousness of the accusation requires that the National Assembly must not dismiss concerns about commercial capture.

7. The Usurpation Of Existing Statutory Mandates

The National Universities Commission already exercises statutory responsibilities relating to university academic standards, programme approval and accreditation. The National Board for Technical Education likewise regulates technical and vocational education and accredits programmes within its jurisdiction.

The proposed Bill's provisions concerning curriculum prescription, institutional inspection, examination standards and recognition of qualifications therefore demand particularly careful scrutiny.

CEFSAR objects to any arrangement under which a professional body could independently invalidate, override or obstruct educational decisions lawfully taken by established statutory authorities without clear jurisdictional boundaries.

Professional competency requirements may supplement academic qualifications. They should not arbitrarily displace the legal responsibilities of the institutions that award and accredit those qualifications.

7.1 Existing Mandates Must Be Respected

Existing Institution	Established Area Of Responsibility
National Universities Commission (NUC)	University academic standards and accreditation
National Board for Technical Education (NBTE)	Technical and vocational education standards and accreditation
NAFDAC	Regulation of foods, drugs and other products within its statutory mandate
Standards Organisation of Nigeria (SON)	Relevant national product and quality standards
Universities And Research Institutions	Teaching, research, scientific inquiry, approved academic programmes and community service
Relevant Health-Profession Regulators	Defined professional services within their respective statutory jurisdictions

This distribution of responsibilities is not an argument against coordination. It is an argument for respecting statutory competence.

The National Assembly must resist creating overlapping centres of authority without a clear demonstration of regulatory necessity.

7.2 Excessive Sanctions Threaten Proportionality

CEFSAR's legislative analysis of the proposed draft bill identifies penalties under sections 23 and 27–30, including potentially substantial fines and imprisonment, alongside concerns about unclear boundaries between regulated professional practice and legitimate educational or community activities.

Criminal sanctions must be tied to clearly defined offences and demonstrable public harm.

An ambiguous professional-registration requirement must not become a means of intimidating researchers, educators, community organisations or small enterprises.

Where conduct is genuinely fraudulent, dangerous or professionally negligent, existing laws and appropriately defined professional standards should be applied.

The public interest is not served by criminalising ordinary scientific communication or community food education.

8. Food-System Capture: A Broader Threat Than Professional Monopoly

Nigeria must examine the proposed legislation within the wider economic context of food-system concentration.

Food-system capture can occur when decision-making power over essential food-system functions becomes

concentrated among a relatively small number of commercial, institutional or political actors.

Its potential dimensions include control over agricultural inputs, seeds, food processing, distribution, research priorities, public procurement, regulatory standards and consumer information.

These risks do not arise exclusively from genetically modified crops. They can occur in conventional agriculture, proprietary seed systems, commodity trading, food manufacturing and other commercial arrangements.

The fundamental question is whether Nigerian farmers and consumers retain meaningful choices.

A country may produce significant quantities of food while remaining vulnerable to external influence if its seed systems, agricultural inputs, financing, processing infrastructure and technical expertise become excessively dependent on a limited number of suppliers.

Equally, a country may possess professionally trained nutritionists while experiencing widespread malnutrition because households cannot afford adequate diets.

Therefore, food sovereignty cannot be reduced to professional registration.

It requires investment in domestic production, indigenous crop research, competitive agricultural markets, food-safety surveillance, resilient infrastructure and informed consumer choice.

8.1 The Danger Of Dependency

CEFSAR identifies five strategic vulnerabilities requiring national attention:

- Seed-system dependency: Reduced farmer access to affordable, locally adapted and reproducible planting materials.
- Knowledge dependency: Marginalization of indigenous expertise and independent Nigerian research.
- Commercial dependency: Excessive reliance on imported agricultural inputs, proprietary technologies or concentrated supply chains.
- Regulatory dependency: Undisclosed external influence over standards, approvals, educational priorities or professional practice.
- Nutritional dependency: Displacement of diverse indigenous diets by narrow, heavily marketed or economically inaccessible food systems.

These are potential structural risks. Nevertheless, legislation should be assessed for whether it could intensify such vulnerabilities.

A law that concentrates authority while providing insufficient transparency, institutional independence and protection for competing knowledge systems deserves rejection until those deficiencies are corrected.

9. The Scientific Case For Preserving Indigenous Nutritional Diversity

Nigeria's traditional foods constitute a valuable foundation for improving national dietary quality.

Indigenous cereals, legumes, tubers, vegetables, fruits, nuts, oilseeds and fermented foods can contribute to the supply of dietary energy, protein, fibre, vitamins, minerals and other bioactive compounds.

Their nutritional contributions vary with species, cultivar, soil conditions, processing method, preparation and portion size.

Traditional foods must therefore be studied scientifically rather than romanticized uncritically.

A comprehensive national programme should investigate nutrient composition, anti-nutritional factors, contaminant exposure, bioavailability, microbial safety, food processing and population-specific dietary requirements.

This is particularly important because the 2024 Nigeria Demographic and Health Survey reported that only 30% of women surveyed met its minimum dietary-diversity indicator.

The appropriate response is to expand access to diverse, affordable and safe foods, not to place unnecessary restrictions on the dissemination of legitimate food knowledge.

Nigeria should develop and continuously update an indigenous food-composition database, support regional

food laboratories, strengthen traditional food processing, preserve crop diversity and integrate culturally appropriate nutrition education into public programmes.

These priorities would provide measurable national benefits.

They would also create opportunities for Nigerian universities, agricultural research institutions, laboratories, cooperatives and food enterprises.

CEFSAR submits that the future of Nigerian nutrition must be built upon the scientific advancement of its food heritage, not the institutional marginalization of that heritage.

10. CEFSAR's Formal Demands to the National Assembly

CEFSAR respectfully but firmly requests the following actions:

1. Withdraw the Nutritionists Registration Council of Nigeria Bill, 2025, in its present form. Its proposed scope and institutional implications require fundamental reconsideration rather than cosmetic amendment.

2. Reject any claim to general regulatory authority over national nutrition. Any future professional council must have a clearly delimited jurisdiction, with express protections for ordinary food education, agriculture, independent research, journalism and cultural food practices.

3. Protect existing statutory mandates. University accreditation, technical education, food-product regulation and biosafety oversight must remain within their legally established institutional jurisdictions.
4. Commission an independent regulatory-impact and mandate-mapping assessment. The assessment must examine duplication, compliance costs, institutional conflicts, public-health benefits, effects on small enterprises and implications for indigenous knowledge.
5. Investigate possible conflicts of interest. Require transparent disclosure of relevant domestic and foreign funding, corporate relationships, institutional partnerships and financial interests connected to the Bill's sponsorship and proposed governance.
6. Protect independent food and nutritional research. No professional registration law should suppress lawful scientific criticism, consumer education, independent laboratory reporting or advocacy for conventional, indigenous or alternative agricultural and food systems.
7. Prioritize Nigeria's actual nutritional needs. Redirect policy attention toward dietary diversity, food affordability, laboratory capacity, food-borne-disease surveillance, indigenous food research, agricultural extension and locally owned food value trains.
8. Require genuinely inclusive consultation. Any future proposal must involve farmers, consumers, universities, food scientists, nutritionists, dietitians, relevant health professionals, indigenous knowledge custodians,

agricultural organizations, laboratories, public-health institutions and existing regulators.

These demands do not seek a coherent, proportionate and independent regulatory system that protects the public without creating unnecessary monopolies.

11. A Constructive Alternative: Regulate The Profession, Not The Nation's Food

CEFSAR does not oppose the voluntary organization of nutrition professionals.

An association may establish membership criteria, ethical standards, continuing professional development requirements, professional recognition and internal disciplinary procedures.

If the National Assembly determines that additional statutory regulation is necessary for specified professional activities, the legislation should identify those activities precisely and justify their restriction through evidence of public-health necessity.

Such regulation should operate in harmony with existing educational and health-profession authorities.

It should also guarantee independent governance, public accountability, transparent financing, fair disciplinary procedures and effective judicial review.

Most importantly, it should explicitly exclude ordinary household food practices, community nutrition education, scientific research, agricultural extension, food journalism,

consumer advocacy and cultural knowledge transmission from any unnecessary professional monopoly.

This would preserve the legitimate aspirations of qualified nutrition professionals without transferring broad national food-system authority to their association.

Let the association regulate its members.

Let existing statutory authorities discharge their lawful responsibilities.

Let universities pursue knowledge.

Let farmers cultivate.

Let scientists investigate.

Let communities preserve their food heritage.

And let Nigerians retain the freedom to make informed choices about what they eat.

12. CEFSAR'S Submission: The Sovereignty of a People Begins With Their Food

The National Assembly is confronted with a choice extending beyond the administrative structure of a professional council. It is a choice about:

- I) The boundaries of public authority,
- II) The independence of scientific inquiry,
- III) The preservation of indigenous knowledge and
- IV) The protection of Nigeria's nutritional future.

Nigeria's food heritage belongs to its people.

Its agricultural knowledge has been cultivated across generations. Its nutritional traditions reflect centuries of adaptation to diverse ecological environments. Its universities and research institutions possess statutory responsibilities that must be respected. Its consumers deserve safe foods, honest information and meaningful choices.

No professional association, however well intentioned, should be granted an undefined authority capable of subordinating these interests to its institutional preferences.

No commercial interest, whether domestic or foreign, should be permitted to purchase influence over the public's access to independent nutritional knowledge.

No law should silence scientists who responsibly question the safety, nutritional value, environmental implications or commercial claims of food products.

And no legislative proposal should be accepted merely because it presents professional regulation as synonymous with public protection.

Professional competence is important. Public accountability is indispensable. But neither justifies an excessive concentration of regulatory power.

The Nigerian people need stronger food systems, better laboratories, more affordable wholesome foods, resilient

indigenous agriculture and scientifically informed nutritional education.

They do not need legislation that risks creating an additional bureaucratic barrier between communities and their food heritage.

The proposed Bill has not demonstrated that its broad regulatory architecture is necessary, proportionate or superior to strengthening existing institutions.

For these reasons, CEF SAR urges the National Assembly to reject the Bill in its present form, require a comprehensive independent review and pursue an alternative framework grounded in institutional competence, scientific independence, public accountability and national food sovereignty.

Our position is therefore clear, principled and unequivocal:

Regulate professional conduct, not cultural inheritance.
Protect public health, not institutional monopolies.
Strengthen Nigerian science, not regulatory dependency.
Safeguard food sovereignty, not commercial privilege.

A nation that loses meaningful control over its food systems risks compromising its economic resilience, cultural continuity and capacity for independent development.

Nigeria must not permit that outcome through legislative inadvertence.

**WITHDRAW THE BILL. PROTECT INDIGENOUS
FOOD SYSTEMS. DEFEND SCIENTIFIC**

FREEDOM. PRESERVE NIGERIA'S FOOD AND NUTRITION SOVEREIGNTY.

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A Few Research and Documentary Foundations

The following materials support the principal empirical and institutional submissions.

- i. Nigeria Demographic and Health Survey 2024, National Population Commission and partners. National and state-level indicators of child nutrition, maternal anaemia and dietary diversity. .*
- ii. National Universities Commission. Statutory academic standards and university accreditation responsibilities. .*
- iii. National Board for Technical Education. Regulation and accreditation of technical and vocational institutions. .*