

A Comparative Analysis of Climate Change Laws in Nigeria with Some Selected Jurisdictions

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Abstract

The protection of the environment and its resources through climate action forms part of the blueprint of the United Nations to achieve a better and sustainable future for all. With the grave threat of global warming and climate change, poses an obstacle to the possibility of achieving this goal. Most countries have begun to enact legislations seeking to regulate and mitigate climate change. There is evidence of commitment among member states of the international community towards legislations that would guarantee the protection of climate and the environment in general. Nigeria, in seeking to join the movement, has enacted a plethora of legislations that seek to regulate climate change. However, there exists much skepticism about its feasibility, particularly as the legislation on climate change in the country seems inadequate. Most Nigerians are still in flagrant disregard of relevant laws regulating climate change in the country and are yet to understand their duty to protect the environment. Also, corporate and social responsibility as it relates to climate change in almost non-existent in the country. The successes of existing legislations and challenges militating against the implementation of climate change legislations in different countries will equally be examined in this article.

Keywords

Climate Change, Environment, Legislation, Sustainability, Green House Gas

1. Introduction

Nations all around the world have started to take legal measures to address and mitigate the effects of climate change as the international community struggles with its growing challenges (Imperial College London, 2023). While sharing a

common goal, these laws frequently take different approaches, reflecting the distinct opportunities, problems, and priorities of each country (Imperial College London, 2023). Nigeria presents an intriguing case study in climate governance due to its diversified ecosystems and quickly expanding economy (Jonathan & Emmanuel, 2017). We can get insights into the various approaches used by different countries, evaluate their efficacy, and find best practices that could be modified to fit certain regional circumstances by contrasting Nigeria's climate change legislation with those of other nations. In this article, we undertake a thorough comparative analysis, contrasting Nigeria's climate change law with that of other countries. By examining the differences, and innovative approaches within these legal frameworks, we aim to shed light on the strengths and weaknesses of Nigeria's approach. This analysis will provide crucial insights into the country's preparedness to mitigate and adapt to the impacts of climate change, offering valuable insights into the legal framework of other countries.

1.1. The Climate Change Act, 2021

The Nigeria Climate Change Act was passed in 2021, as a key piece of legislation supporting the country's attempts to address the intricate and extensive problems caused by climate change.

Nigeria, a party to international agreements like the Paris Agreement, has pledged to take significant efforts to reduce greenhouse gas emissions and prepare for the effects of climate change because it recognizes the importance of this issue (President Buhari, 2016).

The Act¹ lays the ground work for accomplishing goals centred on lowering greenhouse gas emissions (GHG), advancing inclusive green growth, and fostering sustainable economic development by:

- 1) ensuring that Nigeria formulates programmes for achieving its long-term goals on climate change mitigation and adaptation strategies;
- 2) facilitating the coordination of climate change action needed to achieve long-term climate objectives;
- 3) mainstreaming climate change actions in line with national development priorities;
- 4) facilitating the mobilization of finance, and other resources necessary to ensure effective action on climate change;
- 5) setting a target for year 2050-2070 for the attainment of a net-zero GHG emission, in line with Nigeria's international climate change obligations;
- 6) identifying risk and vulnerabilities, building resilient and strengthening existing adaptive capacities to the impact of climate change;
- 7) ensuring that climate change policies and actions are integrated with other related policies for promoting socio-economic development and environmental integrity;
- 8) implementing mitigation measures that promote low carbon economy and

¹Climate change Act 2021.

sustainable livelihood; and

9) Ensuring that private and public entities comply with stated climate change strategies, targets and National Climate Change Action Plan².

The Act is relevant to the Ministries, Departments, and Agencies (MDAs) of the Nigerian federal government, as well as public and private organisations operating within Nigeria. Its primary purpose is to create mechanisms that encourage the development of a society with reduced carbon emissions, a focus on environmental sustainability, and increased resilience to climate-related challenges³.

The Act establishes the Climate Change Fund, managed by the Council, which will receive funding from sources such as budget allocations, grants, international support, penalties, carbon taxes, and other specified funds. This fund is dedicated to financing climate change-related initiatives and activities⁴. The Fund will be used for a variety of climate related initiatives, such as implementing policies, assisting with advocacy, and encouraging both public and private enterprises to speed up their switch to clean energy⁵.

Section 17 of the Climate Change Act grants the Council the authority to seek financial support from various sources, including financial organisations and institutions, to fulfil its responsibilities. Essentially, it acknowledges that addressing climate change often requires substantial financial resources beyond what may be allocated through regular budgeting processes.

The Act mandates the Federal Ministry of Environment, in collaboration with the Ministry of National Planning, to establish a carbon budget for Nigeria. The primary goal of this carbon budget is to restrict the global temperature increase to 2°C above pre-industrial levels, with an ambitious target of limiting it to 1.5°C. It empowers the Ministry to formally define the carbon budget, including its duration to periodically update it in accordance with Nigeria's Nationally Determined Contributions (NDCs) and international climate commitment. It underscores the Nigeria's commitment to responsible climate governance and aligning with global efforts to combat climate change⁶. It further empowers the council to create regulations that can impose climate change related obligation on public entities and make adjustments or revocations as deemed necessary to address evolving climate challenges⁷.

The Act provides that the secretariat, in collaboration with the Federal Ministry of Environment, Civil Society Organisations (CSOs), women, Youth and others, is tasked with monitoring climate related plans and project, and engaging in climate advocacy. They are also required to provide relevant information, as per the freedom of information Act, to CSOs, Youths, Women and others to

²Section 1, Climate change Act, 2021.

³Section 2 Climate change Act 2021.

⁴Section 15 (1) Climate change Act, 2021.

⁵Section 15 (2) Climate change Act 2021.

⁶Section 19 (1) (a) (b) Climate change Act 2021.

⁷Section 23 Climate change Act 2021.

support Nigeria's effort in climate change mitigation and adaptation⁸.

Section 27 of the Act provides that the council is responsible for encouraging and endorsing nature based solution to decrease greenhouse gas emissions and address climate change challenges in Nigeria.

The Act further provides that the Federal Ministry of Environment is mandated to establish a REDD+ Registry in Nigeria, which will consist of sub-national modes. This registry will capture REDD+ activities, including updates on Forest Reference Emission Levels (FREL)⁹. REDD+ stands for 'Reducing Emissions from Deforestation and Forest Degradation' and includes activities related to conservation, sustainable forest management, and increasing forest carbon stocks. Additionally, the council has the authority to offer fiscal support to REED+ activities to meet Nigeria's climate change commitment¹⁰.

According to the Act, anyone, whether individual or organisation, who hinders effort related to mitigation and adaptation measures outlined in the Act is considered to have committed an offence and is liable to a penalty to be determined by the council¹¹. In cases related to climate change or environmental issues brought before a court, the court has the authority to make an order:

- 1) To prevent, stop or discontinue environmentally harmful actions;
- 2) Compel public officials to take actions to prevent or stop such harmful actions.
- 3) Award compensation to individuals directly impacted by these harmful environmental actions¹².

The Nigeria climate Change Act is a welcome step forward in the fight against climate change. The Act's main elements are based on environmental values including sustainable development and citizen engagement (Omeihe Cynthia, 2022). However, there are some areas where the Act may be strengthened:

- 1) The Act does not specify specific targets for reaching net-zero emission of greenhouse gases. The Act specifies a target of net-zero emission by 2050-2070, but it makes no mention interim targets of sector-specific targets. These goals are not ambitious enough and will not be enough to keep global warming to 1.5 degree Celsius.
- 2) The Act makes no mention of the funding sources necessary to carry out its implementations. This will make it possible to gather the necessary funding to carry out the Acts objectives.
- 3) The Act fails to set up an effective or precise enforcement procedures for its provisions. This will make it difficult to guarantee the Act's successful implementation.
- 4) There are no provisions in the Act for public involvement in its implementation. Public involvement is crucial to the success of any Climate change policy.

⁸Section 25 (1) and (2) climate change Act 2021.

⁹Section 28 (1) Climate change Act 2021

¹⁰Section 28 (2) and (3) climate change Act 2021.

¹¹Section 34 (1) Climate change Act 2021.

¹²Section 34 (2) Climate change act 2021.

5) The Act placed too much emphasis on appointment making and not enough on establishing precise, aggressive target and enforcement mechanisms.

1.1.1. Key Issues of Nigeria's Climate Change Policy

The key issues of Nigeria's climate change policy are the development of a national climate change policy aimed at reducing Greenhouse Gas (GHG) emissions and reduce the socio-economic impacts of the adverse effect of climate change¹³ and the need for a medium term outcome to achieve a resilient socio-economic environment that promises sustainable development. There is also the issue of Nigeria's vulnerability to the impact of climate change and the need to implement climate change mitigation initiatives¹⁴. The conditions necessary for actualising a Climate resilient economy is also of great concern. The goals of climate change management in Nigeria as well as principles and strategies to guide the implementation of activities aimed at reducing the potential adverse effects in Nigeria's economic development also borders the country in her desire to implementing climate change policies¹⁵.

1.1.2. Impacts of Climate Change Policy on Nigeria's Economic Development

The results indicate that both in the long term-run and short term-run, carbon emission affect output growth in Nigeria adversely. In addition, forest depletion impacts negatively on national output in Nigeria in the short term-run. The results imply that Nigeria government should evolve and implement climate change policy to curb carbon emission and forest depletion.

1.2. United Kingdom Climate Change Act 2008

The Climate Change Act 2008 serves as a foundation for the UK's strategy in addressing and responding to climate change (*Climate Change Committee, 2023*). It mandates the reduction of carbon dioxide and other greenhouse gas emissions while necessitating adaptation to climate change risks. Additionally, it sets up the structure to achieve these goals and align the UK's dedication to immediate global efforts against climate change (*Climate Change Committee, 2023*).

The Act provides that the Secretary of State in the UK has a duty to ensure that by the year 2050, the country's net carbon emissions are reduced by at least 80% compared to the combined total of carbon dioxide emissions and other greenhouse gases emitted in the year 1900¹⁶. The 1900 baseline refer to the combined emissions of carbon dioxide and other specific greenhouse gases in the UK for the year 1900, as well as the emissions of each greenhouse gas in the year that serves as its base year¹⁷. This baseline is used as a starting point for measuring

¹³Section 1 of the national climate change policy for Nigeria, 2021-2030.

¹⁴Section 2 of the national climate change policy for Nigeria, 2021-2030.

¹⁵Section 4 of the national climate change policy for Nigeria, 2021-2030. See also FM of environment, Department of climate change.

¹⁶Section 1 UK climate change Act 2008.

¹⁷Section 1 (2) (a) and (b) UK climate change Act 2008.

reductions.

The Secretary of state is responsible for establishing a carbon budget for each five-year period starting from 2008-2012 and ensuring that the UK's actual carbon emissions during a given budgetary period do not surpass this designated carbon budget¹⁸. This duty is aimed at controlling and reducing the country's carbon emissions. The carbon budget for each budgetary period can be established at different times but it must be set before specific deadlines: before June 1, 2009, for the periods 2008-2012, 2013-2017, and 2018-2022 and not later than June 30th in the 12th year preceding the start of any subsequent period¹⁹. The Secretary of state is required to establish the carbon budget for a budgetary period through an official order²⁰. The carbon budget for a period must be established with the aim of achieving the 2050 target²¹.

Section 11 of the UK Climate Change Act provides that the secretary of state must determine the maximum allowable amount of carbon units that can be credited to the UK's carbon account for every budgetary period. The net amount of carbon units added to the UK carbon account during a period and subtracting the amount of carbon units removed from the account during the same period, as specified by these regulations²².

The Act provides that the secretary of state is required to promptly provide parliament with a report after establishing a carbon budget for a budgetary period. This report should include an estimated annual range for the net UK carbon account for each year²³. Before presenting a report to parliament, the Secretary of state must consult with other national authorities regarding the estimated annual ranges provided in the report²⁴. An indicative annual range is a range of values that the secretary of state anticipates the net UK carbon account for a particular year to fall within²⁵. It serves as an estimate of the expected carbon account value for that year.

Section 14 of the Act provided that when performing duties related to 2050 target or carbon target, the secretary of states must take into account the importance of implementing domestic actions within the UK to address climate change. The UK domestic action on climate change refers to efforts within the UK that result in either reducing emissions of specific greenhouse gases or enhancing the removal of these gases, or a combination of both²⁶.

The Act provides that the secretary of state is obligated to annually provide parliament with a statement, starting from 2008²⁷. This statement should include the following details for each greenhouse gas, regardless of whether it's a target-

¹⁸Section 4 (1) (a) and (b) UK climate change Act 2008.

¹⁹Section 4 (2) (a) and (b) UK climate change Act 2008.

²⁰Section 8 (1) UK climate change Act 2008.

²¹Section 8 (2) (a) UK climate change Act 2008.

²²Section 11 (2) (a) and (b) UK climate change Act 2008.

²³Section 12 (1) UK climate change Act 2008.

²⁴Section 12 (3) UK climate change Act 2008.

²⁵Section 12 (2) UK climate change Act 2008.

²⁶Section 15 (2) UK climate change Act 2008.

²⁷Section 16 (1) UK climate change Act 2008

ed greenhouse gas:

- 1) The amount of the gas emitted, removed and the net emissions for the UK in that year.
- 2) The methods used to measure or calculate these amounts.
- 3) Whether these amounts have increased or decreased compared to the equivalent figures from the previous year²⁸.

Section 19 of the Act provides that the net UK carbon account exceeds the carbon budget for a period, the secretary of state must promptly provide parliament with a report that outlines proposals and policies to make up for the excess emissions in future periods. The UK carbon account for a period is calculated by subtracting the amount of net UK emissions of targeted greenhouse gases for that period from the number of carbon units credited to the account as per regulations. Additionally, it is increased by the number of carbon units debited from the account according to regulations²⁹. It provides that the total carbon units added to the UK carbon account for a budgetary period should not surpass the limit defined in section 11, which restricts the usage of carbon units for that specific period³⁰.

Section 32 of the Act provides for a cooperate body known as the Committee on Climate Change. The Committee is responsible for advising the secretary of state on whether the percentage mentioned in section 1(1) (the 2050 target) should be modified and, if necessary, what the new percentage should be³¹. The committee is responsible for advising the secretary of state on matters related to each budgetary period, including:

- 1) The appropriate level of carbon budget for that period.
- 2) The strategy for achieving the carbon budget, which involves reducing net UK emissions of targeted greenhouse gases and potentially using carbon units that comply with regulations³².

The committee has a duty to provide advice to the Secretary of State regarding the implications of classifying emissions of specific greenhouse gases from international aviation and international shipping as if they were emissions originating from within the United Kingdom³³.

Section 36 of the Act provides that the Committee is responsible for annually presenting a report to the UK parliament and the devolved legislatures. This report should outline the committee's assessment of:

- 1) The advancement made in achieving the carbon budgets that have been defined under part1 and the 2050 target.
- 2) The additional measures required to fulfil those budgets and targets.
- 3) An evaluation of the likelihood of achieving the budgets and the 2050 tar-

²⁸Section 16 (2) UK climate change Act 2008.

²⁹Section 27 (1) UK climate change Act 2008.

³⁰Section 27 (2) UK climate change Act 2008.

³¹Section 33 (1) (a) and (b) UK climate change Act 2008.

³²Section 34 (1) (a) and (b) UK climate change Act 2008.

³³Section 35 (1) (a) and (b) UK climate change Act 2008.

get.

The Act provided that the secretary of state is obligated to present reports to parliament, which should include an evaluation of the potential risks posed to the United Kingdom by the existing and anticipated consequences of climate change³⁴.

1.3. Climate Change (Scotland) Act, 2009 (2019 as Amended)

The Climate Change (Emission Reduction Target) (Scotland) Act 2019 amended the Climate Change (Scotland) Act 2009 by raising the ambition of Scotland's emissions reduction target to net-zero by 2045 and updating interim and yearly emissions reduction targets (Scottish Government, 2023).

The Act provides that the Scottish ministers are responsible for ensuring that Scotland's net emissions for the years:

- 1) 2020 are reduced by a minimum of 55% compared to the baseline.
- 2) 2030 are reduced by a minimum of 75% compared to the baseline.
- 3) 2040 are reduced by a minimum of 90% compared to the baseline³⁵.

The Scottish Ministers are required to seek advice from the relevant body at least once every five years³⁶. When requesting for advice, the Scottish Ministers should ask the relevant body for their assessment on the feasibility of reaching a net-zero emissions target and, if possible, the earliest attainable year for achieving net-zero emissions, while considering the target-setting criteria³⁷.

The Act provides that the Scottish ministers are required to establish a nitrogen balance sheet. This sheet should qualify significant nitrogen flows across all sectors and environmental components in Scotland, encompassing coastal waters, the atmosphere, soil, and their interactions³⁸. The purpose of the nitrogen balance sheet is to track and document how efficiently nitrogen is utilized and how it impacts the attainment of targets specified in the Act³⁹.

The Act provides that the Scottish Minister must ask the relevant body to produce a report targets, and any additional efforts required to meet them⁴⁰. Section 16 of the Act provides that the Scottish Ministers have the authority to establish regulations, through orders, concerning the greenhouse gas emission from international aviation and international shipping that are linked to Scotland.

Section 32A of the Act provides that the Scottish Ministers are required to create a panel called "citizens assembly" which should consist of individuals chosen by the ministers to represent the general population of Scotland. The citizens' assembly is to be led by two conveners who are impartial and not affiliated with the Scottish Ministers or the Scottish Parliament, and there should be gen-

³⁴Section 56 (1) UK climate change Act 2008.

³⁵Section 2 (1) climate change (Scotland) Act 2009 (2019 as Amended).

³⁶Section 2C (1) climate change (Scotland) Act 2009 (2019 as amended).

³⁷Section 2C (3) (a) climate change (Scotland) Act 2009 (2019 as amended).

³⁸Section 8A (1) climate change (Scotland) Act 2009 (2019 as Amended).

³⁹Section 8A (2) Climate Change (Scotland) Act 2009 (2019 as Amended)

⁴⁰Section 9 (1) climate change (Scotland) Act 2009 (2019 as Amended).

der balance maintained among these conveners⁴¹. The citizen assembly is tasked with:

- 1) Addressing climate change by finding ways to prevent, minimize, or mitigate its effects.
- 2) Providing recommendations for measures aimed at achieving emissions reduction target.
- 3) Offering suggestions on additional climate-related topics referred by the Scottish government⁴².

The Act provides that after each target year, the Scottish Ministers are obligated to present a report to the Scottish Parliament⁴³. This report should include:

- 1) The emission reduction target for that specific year.
- 2) Whether the emissions reduction target for that year has been achieved.
- 3) The percentage by which net Scottish emissions for the target year are lower than the baseline.
- 4) The amount by which net Scottish emissions for the target year deviate from the emissions reduction target for that year.
- 5) The cumulative variation between net Scottish emissions and their corresponding emissions reduction targets from 2018 to the target year⁴⁴.

Section 35 of the Act provides that the Scottish Minister must present a climate change plan to the Scottish Parliament:

- 1) The plan must be presented within 5 years of this section's commencement
- 2) Subsequent plans must be submitted within 5 years of the date when the previous plan was laid.

The plan should outline the specific proposal of the policies of the Scottish Ministers for achieving the emissions reduction targets throughout the plan period⁴⁵.

The act provides the Scottish Ministers have the authority to create a body for advisory functions, which will be named the "Scottish Committee on Climate Change"⁴⁶.

1.4. Danish Climate Act, 2020

Denmark's goal is to be a global leader in environmental sustainability (Batini & Segoviano, 2021). In June 2020, its parliament approved a climate law with the strong support, aiming to cut greenhouse gas emissions to 70% below 1990 levels by 2030 and achieve net-zero emission by 2050 (Batini & Segoviano, 2021). However, in 2021, the Act underwent an amendment that incorporated a new emission reduction goal for 2025, set within the range of 50 - 54 percent (Climate Change Laws of the World, 2023).

⁴¹Section 32A (3) and (4) climate change (Scotland) Act 2009 (2019 as Amended).

⁴²Section 32A (5) climate change (Scotland) Act 2009 (2019 as Amended).

⁴³Section 33 (1) climate change (Scotland) Act 2009 (2019 as Amended).

⁴⁴Section 33 (2) (a)-(e) climate change (Scotland) Act 2009 (2019 as Amended).

⁴⁵Section 35 (2) (a) climate change (Scotland) Act 2009 (2019 as Amended).

⁴⁶Section 25 climate change (Scotland) Act 2009 (2019 as Amended).

The Act provides that the Minister of Climate, Energy, and Utilities is required to establish a national climate target every five years, ensuring it is at least as ambitious as the previous one⁴⁷. Additionally, they must publish a climate action plan every five years, coinciding with the setting of these climate targets, providing a 10-year outlook⁴⁸.

Article 3 of the Act provides that the Minister of Climate, Energy and the Utilities receives impartial guidance on climate initiatives from the Danish Council on Climate Change. This council supports the minister in establishing national climate targets. The Danish Council on Climate Change consists of highly knowledgeable experts in various fields relevant to climate, including energy, construction, transportation, agriculture, environment, economics, climate science, and behavioural research⁴⁹.

The Act provides that the Danish Council on climate Change is required to provide annual recommendations to the minister for climate, Energy, and Utilities concerning Climate initiatives. These recommendations must align with the guiding principles outlined in the act⁵⁰. The Danish Council on Climate Change recommendations should also include an evaluation of whether the government's Climate actions are likely to lead to the achievement of the climate targets⁵¹. The Danish Council on climate Change is required to offer an update on Denmark's international targets as part of their recommendations⁵².

Article 6 of the Act provides that annually, the Minister for Climate, Energy, and Utilities must compile a climate report that includes historical greenhouse gas emissions (both total and by sector), future projections of greenhouse gas emissions (total and by sector), and an overview of how Denmark's climate efforts impact the global environment.

The Act provides that the minister for Climate, Energy and utilities must present an annual climate programme to the Danish parliament, which include a status report on the fulfilment of national climate targets and details on planned climate initiatives, measures, and their expected-short-and-long-term effects⁵³.

The Act provides that Denmark's pursuit of Climate targets should prioritize cost-effectiveness, considering the long-term-shift towards sustainability, sustainable economic growth, Danish Competitiveness, fiscal responsibility, and employment⁵⁴. It should be aimed at enhanced Danish businesses rather than diminish them. Furthermore, Denmark must demonstrate that it can achieve a green transition while upholding a robust welfare society that maintains social cohesion and balance⁵⁵.

⁴⁷ Article 2 (1) Danish climate Act 2020.

⁴⁸ Article 2 (2) Danish climate Act 2020.

⁴⁹ Article 10 Danish climate Act 2020.

⁵⁰ Article 4 (1) Danish climate Act 2020.

⁵¹ Ibid, Article 4 (2) Danish climate Act 2020.

⁵² Article 4 (3) Danish climate Act 2020.

⁵³ Article 7 (1) and (2) Danish climate Act 2020.

⁵⁴ Article 1 (3) and (2) Danish climate Act 2020.

⁵⁵ Article 1 (3) and (3) Danish climate Act 2020.

1.5. Benefits of Climate Change Policy in Developed Countries

It should be noted that the successful implementation of climate change policy has helped developed countries in the following ways:

- 1) It has helped to reduced short-lived climate pollutants that prevent 0.6°C of warming.
- 2) Reduces short-lived climate pollutants that prevent millions from premature deaths each year from air pollution and climate change.
- 3) It promotes food security.
- 4) It makes the swift transition away from coal fired powered plants to carbon free electricity.
- 5) Achieving deep reduction in methane pollution from oil and gas development.
- 6) Accelerating the swift to electric cars, trucks and buses.
- 7) Reduction in people's vulnerability level to climate change, potentially halving the number of people that will fall into poverty due to climate change.
- 8) Boosting human capital by making people more productive and creative because they are healthier and better educated.
- 9) There is reduction in air pollution and more generally a better environment⁵⁶.

1.6. Lessons for Nigeria

In order to reduce the effects of climate change and make the transition to a sustainable future, Nigeria can gain from adopting legislation that is similar to those of the United Kingdom, Scotland, and Denmark.

1) The UK, Scotland, and Denmark have set ambitious targets for reducing emissions. The UK has established a target of reduction of emissions of GHG by 80% by 2050, Scotland has set a net zero emissions by 2045, and Denmark has set a target of a 70% reduction in emissions by 2030 and becoming climate neutral by 2050. The Nigerian Climate Change Act just stipulates that Nigeria's climate change actions must be in line with the NDC and its climate change strategy. As a result, Nigeria would have a binding target emanating from parliament (Noah, 2022), Nigeria should take a proactive stance by establishing comparable long-term targets that can motivate persistent and ongoing efforts to address climate change. Setting concrete, quantifiable, and time-bound goals might help Nigeria take better climate action by fostering accountability and laying out a clear course for reducing emissions.

2) The UK's Climate Change Acts particularly lays out a five-year carbon budgeting scheme to assist the government in focusing and maintaining its goal of reducing 80% of GHG emissions by 2050⁵⁷. Nigeria may reduce its emissions over time with help of five-year carbon budgets, which would offer a precise and predictable framework. Nigeria could consider adopting a comparable structure to establish a well-defined path for reducing emissions and guarantee progress

⁵⁶See the US Clean Air Act, 1970.

⁵⁷UK Climate Change Act 2008.

towards climate goals.

3) The Scotland Climate Change Act incorporated the citizen assembly into its Act⁵⁸. The citizen assembly serves as a successful illustration of how to involve people in the process of creating climate change policy. Nigeria should take inspiration from Scotland's example and set up a citizen assembly to evaluate the data on climate change, thereby fostering public participation.

4) The Nigerian Law does not include emissions from international shipping and aviation in its targets or budgets, although the UK and Scotland laws does. Nigeria could take a cue from the climate regulations in the UK and Scotland and include emissions from international shipping and aviation in its targets and budgets.

5) The Danish Council on Climate Change consists of highly knowledgeable experts in various fields relevant to climate⁵⁹. The need of selecting experts from a range of professions to the advisory council is a crucial lesson Nigeria can learn. By doing this, the government will have access to a variety of viewpoints on climate change and will be able to make well-rounded decisions about its policies.

6) The Scottish Climate Change Acts provides for the establishment of nitrogen balance sheet⁶⁰. This sheet should quantify significant nitrogen flows across all sectors and environmental components in Scotland, encompassing coastal waters, the atmosphere soil and their interactions. By following these steps, Nigeria might create and put into practise a nitrogen balance sheet that would aid in reducing the nation's nitrogen footprint and enhancing the quality of its air and water.

2. Conclusion

The comparative analysis of the laws addressing climate change in Nigeria, the UK, Scotland and Denmark has given a through picture of the many strategies these countries are using in addressing the global climate catastrophe. However, the lesson from this comparative analysis highlights the significance of establishing precise and aggressive climate targets, encouraging global cooperation, and including a variety of stakeholders. Nigeria may improve its climate policy and set up efforts to address climate change by using lessons from the UK, Scotland and Denmark's experiences.

Conflicts of Interest

The authors declare no conflicts of interest regarding the publication of this paper.

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⁵⁸Section 32A (1) climate change (Scotland) Act 2009.

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