

TRANSITION FROM THE FEDERAL INLAND REVENUE SERVICE TO THE NIGERIA REVENUE SERVICE: LEGAL ISSUES ARISING

Meshach Nnama Umenweke*

Abstract

Beyond every infinitesimal vestige of doubt, the repeal of the Federal Inland Revenue Service (Establishment) Act and its replacement by Nigeria Revenue Service (Establishment) Act 2025, represents a reshaping of Nigeria's fiscal and administrative laws. The problem stems from the legal, institutional and operational complexities during transition from the old regime which gets repealed to new regime which has come into existence as well as with respect to continuity of rights, liabilities and pending litigation. This article critically considers sections 40 and 41 of the 2025 Act as they relate to repeal, savings and transitional provisions. This allows for the determination of weaknesses and discrepancies that could undermine the stability or legitimacy of revenue administration during this transitional period. Methodology-wise, the article deploys a doctrinal form of legal analysis by way of statutory interpretation, comparative assessment and analogical reasoning in order to situate the change in Nigeria's administrative law. The central argument is that the 2025 Act secures institutional stability of fiscal governance, which implies the need for clearer judicial guidance in pronouncements concerning administrative disputes. The article finds that the repeal is defensible substantively, but there are need for administrative convergence and interpretative consistency. It proposes

* Prof. M.N. Umenweke, Professor of Law at Nnamdi Azikiwe University, Awka, Anambra State. E-mail: mn.umenweke@unizik.edu.ng

legislative guidance and a role for the courts to ensure that it is carried out smoothly.

Keywords: Repeal, Continuity, Transition, Revenue Administration

1.0 Introduction

Historically, Nigeria's tax administration transformation has reflected the broader institutional transition from fragmented colonial fiscal systems to centralised modern governance regimes. The Act 2007 marked the first major legislative inroad at unifying the assessment, collection, and accounting for Federal Taxes under a single statute body to wit: The FIRS (Federal Inland Revenue Service)¹. Nevertheless, despite its successes, the Act was also criticised for structural failures, service function overlapping with state agencies and poor digital integration, giving rise to a tax-to-GDP ratio of only 6.7% in 2020 against an average of 16% in Sub-Saharan Africa.² The shortcomings of the 2007 framework were further exposed as Nigeria's economy grew suddenly, thanks to e-commerce, informal trade and cross-border transactions occurring outside the realm of traditional tax net³. These economic realignments necessitated a redesign of the institutional and legal system in order to strengthen efficiency, transparency, and coordination in Nigeria's fiscal system.

The journey in the legislation towards the Nigeria Revenue Service (Establishment) Act 2025 is therefore an enactment history indicative of a change in mindset consistent with efforts to consolidate the tax

¹ I O Okauru, *Tax Administration Reform in Nigeria: A Review of the FIRS Experience*. (Lagos: FIRS Publications, 2012), p. 47.

² Organisation for Economic Co-operation and Development (OECD). *Revenue Statistics in Africa 2022*. Paris: OECD Publishing, 2022, p. 115.

³ T Fowler, "The Future of Tax Administration in a Digital Economy." *Nigerian Tax Journal* 4, no. 2 (2019): 85–100.

administration system into more effective and technology-driven determination and collection process. The new Act came on the heels of the repealing of FIRS law and contains far-reaching provisions intended to bring Nigeria's revenue administration in tandem with global standards in digital tax governance and fiscal transparency⁴. The reform introduced in 2025 was aimed at abrogating any legal and operational overlaps between tax administrations, so that the NRS would act as a unity in matters of assessment, collection and enforcement⁵. It was also intended to bring in consistency in data management using digital platforms and reduce corruption by increasing accountability⁶. Accordingly, the change was not just administrative but a clear legal reorganisation of Nigeria's fiscal machinery in order to deal with some new economic and international obligations on exchange of tax information.

In terms of legal justification for the repeal of the FIRS Act, there was disconnect between Nigeria's archaic administrative structure and the contemporary requirements of international tax administration. The 2007 Act was drafted for a mostly manual global economy yet the age of globalization and invention now produced an economic sector with much more cross-jurisdictional capability, its own assets driven underground by compliance forces⁷. The FIRS regime had grown to a point where it was weighed down by greater than 37 per cent of its total revenue as cost of administration, leaving only an unsustainable balance for operations⁸. Under the auspices of the National Tax Policy

⁴ Nigeria Revenue Service (Establishment) Act, 2025, s. 3(2)(b).

⁵ Federal Ministry of Finance. Tax Administration Reforms and the Fiscal Policy Roadmap 2025–2030. Abuja: FMF Publications, 2025, p. 9.

⁶ United Nations Economic Commission for Africa (UNECA). Tax Digitalization in Africa: Trends and Challenges. Addis Ababa: UNECA, 2023, p. 52.

⁷ W Alli, *Fiscal Modernization and Revenue Governance in Nigeria*. (Ibadan: Spectrum Books, 2021), p. 88

⁸ National Bureau of Statistics (NBS). Annual Fiscal Performance Report 2024. (Abuja: NBS, 2025), p. 41

Implementation Committee, the Nigerian Government recommended repeal and re-enactment, rather than amendment alone, to provide a new legal framework that will harmonise statute law with administrative model/formats as well as institutional synergy among Ministries, Departments and Agencies⁹. This more general approach characterizes most emerging economy's attempts at fiscal reform, in which the emphasis is on a process of institutional reorientation grounded in legislative renewal.

The movement from the FIRS to NRS is a fundamental change of both law and institutions, with implications for continuity, legitimacy and accountability. Sections 40 and 41 of the NRS Act provide that all rights, liabilities and legal process (including any proceedings) in relation to any of those matters which were acquired, incurred, accrued or commenced under the former Service are preserved¹⁰. This is in terms of section 6 of the Interpretation Act (Cap. (See I23 LFN 2004)', which saved administrative acts that were done prior to the repeal of the statute¹¹. But we retain those savings clauses, and the exact parameters of these provisions have led to scholarship regarding the extent to which delegated powers, contracts, and employee rights can walk away unimpeded to the new legal entity¹². Legal challenge to this end is not only for the sake of right retention, but also in the sense that administrative succession should not be either conflated or prejudiced in respect as to issues of jurisdiction and due process.

Empirically, Nigeria's revenue structure, prior the 2025 Act was reported to be largely dependent on oil resources, generating

⁹ C Ekeocha, "Legislative Framework for Tax Administration in Nigeria." *Journal of African Law and Governance* 11, no. 1 (2024): 32–47.

¹⁰ Nigeria Revenue Service (Establishment) Act, 2025, s. 41(a)–(m).

¹¹ Interpretation Act, Cap. I23 Laws of the Federation of Nigeria, 2004, s. 6

¹² A Okeke, "Statutory Repeal and Institutional Continuity in Nigerian Administrative Law." *Nigerian Law Review* 19, no. 2 (2023): 64–80.

approximately close to 65% of total federally collectable revenues while non-oil compliance stood at less than 20 percent¹³. The 2025 transition commits to changing this imbalance by supporting the NRS in extending the tax base, closing revenue leaks and improving cooperation with subnational governments¹⁴. In addition, given the estimated unremitted taxes of more than ₦23 trillion through ITAS audit by 2023, the legal framework for NRS was purposively framed to undergird robust compliance and recovery apparatuses¹⁵. This evidence-based legal reform is a reminder that the repeal was more than merely an about institutional ‘rebranding’, but also served as a necessary corrective to historical inefficiencies, based on old-fashioned legal presumptions. Consequently, the critical point of this article is to analyze the legal and institutional consequences (and implications) that may arise from the repeal and transfer from the FIRS to NRS, especially sections 40 & 41 of Act 2025. The article queries how these provisions accommodate or challenge the doctrines of continuity, savings and administrative propriety under Nigeria’s fiscal transition paradigm. This question is important because an answer can resolve regulatory uncertainty, so that administrative succession does not disturb extant rights and liabilities and pending lawsuits. In the end, the paper adds to a larger discussion about legislative reform, institutional stability, and judicialisation of fiscal governance in Nigeria.

0.2. Doctrinal Basis of Legislative Repeal and Institutional Continuity

The constitutional and statutory foundation of legislative repeal in Nigeria is essentially domiciled in the Interpretation Act which is

¹³ Central Bank of Nigeria (CBN). Annual Economic Report 2023. Abuja: CBN Publications, 2024, p. 73.

¹⁴ Federal Inland Revenue Service. Revenue Performance Report 2023. (Abuja: FIRS, 2024), p. 58.

¹⁵ International Monetary Fund (IMF). Nigeria: Fiscal Reform Assessment Report. Washington, D.C.: IMF, 2024, p. 19.

essentially interpretative with regard to repeals, savings and transitional provisions¹⁶. It states that unless the legislature shall have otherwise expressly provided for in a particular enactment, when any provision or clause of an act is repealed, all rights, privileges and immunities conferred by such provision are immediately terminated¹⁷. It represents the doctrine of constitutional continuity pursuant to section 315 of the 1999 Constitution (as amended) that existing law shall remain in force even after a new law is enacted; until it is repealed or amended. This doctrinal framework also ensures that, in the event of institutional transition, for instance, substituting the Federal Inland Revenue Service (FIRS) with Nigeria Revenue Service (NRS), administrative discontinuity and voidance action during such a time are avoided. In this respect, the Interpretation Act also has a stabilising function - legal order is preserved while statutory change takes place. At the same time, it upholds the theory of legislative supremacy by enabling the National Assembly to repeal and re-enact laws without producing institutional or procedural voids¹⁸.

In the Nigerian jurisdiction, repeal does not obliterate the law but entails legal re-arrangement underpinned by the interpretive machinery of the Interpretation Act. The Act states in section 6(1)(b) that the repeal shall not effect any right, privilege, obligation or liability acquired, accrued or incurred under the law repealed maintaining the continuity of legal relations¹⁹. This doctrine serves to keep in force administrative actions taken pursuant to an abrogated statute until they are replaced or

¹⁶ Interpretation Act (Cap. I23 LFN 2004), Laws of the Federation of Nigeria. Accessed October 23, 2025. <https://placng.org/lawsofnigeria/view2.php?sn=355>

¹⁷ *Ibid*.

¹⁸ "Interpretation Act." Commonwealth Legal Information Institute (CommonLII). Accessed October 23, 2025. https://www.commonlii.org/ng/legis/num_act/ia191/

¹⁹ "Interpretation Act, Cap. I23 LFN 2004." Food and Agriculture Organization (FAO) Legal Office (FAOLEX). Accessed October 23, 2025. <https://faolex.fao.org/docs/pdf/niu136344.pdf>

modified under the new regime. In actual application, an administrative mechanism failure can be avoided when it comes to fiscal institutions by continuous assessment, contracts and litigation. The savings proviso doctrine reflects the principle that predictability and the rule of law are paramount during periods of statutory change²⁰. For this reason, when the Legislature pass the Nigeria Revenue Service (Establishment) Act 2025, the repeal provisions of that act have to be read harmoniously with these general saving rules on legal and institutional continuity.

The doctrine of continuator as established on the English legal system and replicated in Nigerian case law, holds that a repeal does not remove obligations or rights already existing under the repealed law. It acts as a stabilizing power, through which the operational legitimacy of public powers and institutions is maintained in statutory change²¹. This doctrine is doctrinally based on the presumption against retrospectively that statutes do not deprive people of vested rights unless the contrary clearly appears. When the FIRS Act 2007 was repealed by the NRS Act 2025, administrative actions (e.g. contracts of employment, tax assessments and regulatory authorisations) were preserved under this principle. Courts have generally relied on this presumption in order to maintain administrative continuity, and also a hole in the law which could threaten the economy²². The principle therefore serves both to

²⁰ National Institute for Legislative and Democratic Studies (NILDS). “Legislative Drafting: The Role of Savings and Transitional Clauses.” NILDS Journal of Legislative Studies, Vol. 9 No. 2 (2021). Accessed October 23, 2025. <https://journal.nials.edu.ng/index.php/nijld/article/download/59/59/112>

²¹ New South Wales Parliamentary Counsel’s Office. Drafting Savings and Transitional Provisions (DP4). Accessed October 23, 2025. https://legislation.nsw.gov.au/file/dp4-drafting_savings_and_transitional_provisions_170321.pdf

²² O H Yusuf, “Judiciary and Political Change in Africa: Developing Transitional Jurisprudence in Nigeria.” *International Journal of Constitutional Law* 7, no. 4 (2009):

maintain the function of institutions and to preserve confidence in the sense that legal authority is uniform.

Nigerian jurisprudence has held decisively that repealed laws remain in force due to the saved and transitional provisions. The courts have construed past repeals in numerous administrative cases to maintain vested rights and pending proceedings unless the legislature does so expressly²³. This interpretative approach is consistent with section 6(1)(c) of the Interpretation Act that saves investigations, legal proceedings and remedies under repealed enactment. It also embodies a judicial predilection for stability and regularity in public administration, especially at the time of institutional adjustment. In tax law, it is used to guarantee that tax liabilities and their enforcement exist under the old regime and automatically continue into the new one so as to avoid a break in fiscal records²⁴. The courts in that sense act as doctrinal guardians to avoid unwanted erosion of the mechanisms central for national revenue planning and collection that proper reform would have prevented.

A normative doctrine of legislative repeal and institutional continuity will require conscientious transitional drafting, purposive interpretation. Legislators should be encouraged to include clear savings and transitional provisions clarifying the continuation of administrative authority, employees' rights and continuing liabilities in an institution-

654–679. Accessed October 23, 2025. <https://academic.oup.com/icon/article/7/4/654/733733>

²³ Lexology. "High Court Ruling on Effect of Repealed Legislation." Published March 20, 2013. Accessed October 23, 2025. <https://www.lexology.com/library/detail.aspx?g=92a51367-e46c-4c40-9a28-73423166347b>

²⁴ International Commission of Jurists (ICJ). Nigeria: The Rule of Law and Transitional Justice Report. Accessed October 23, 2025. <https://www.icj.org/wp-content/uploads/1996/01/Nigeria-rule-of-law-thematic-report-1996-eng.pdf>

altering process²⁵. Drafting manuals encourage the use of such clauses on grounds that serve to make a system predictable, protect expectations, and avoid constitutional attacks based on procedural lacunae²⁶. This development should be encouraged by judicial guidance in interpreting repeal clauses in accordance with the will of Parliament, maintaining a presumption of continuity where doubt exists. In terms of Nigerian fiscal reform, theoretical and practical arguments in favour of substitution of FIRS by NRS are doctrinally synthesised to secure administrative legitimacy. Accordingly, a repeal is not an end in itself, but instead a legal mechanism carefully constructed to anchor reforms rather than being a mere destructive act.

0.3. Analytical Review of Sections 40–41 of the Nigeria Revenue Service (Establishment) Act, 2025

The transitional epitome of the former Federal Inland Revenue Service (Establishment) Act, 2007 and the present institutional architecture entrenched in Nigeria Revenue Service (Establishment) Act, 2025 is represented by sections 40 and 41 of the latter. Subsection 40(1) expressly repeals the 2007 Act, and subsection (2) qualifies that repeal by stating that “without prejudice to section 6 of the Interpretation Act, the repeal of the Act referred to in subsection (1) does not affect anything done or purported to have been done under it.”²⁷ This section is meant to give legal effect to previous administrative and operational deeds and ensures that what the old FIRS had done, for instance would continue to remain valid as it was before it did those things. Section 6

²⁵ Commonwealth Parliamentary Association. “Final Provisions: Repeal and Transitional Clauses in Legislative Drafting.” Accessed October 23, 2025. <https://parliamentarycounsel.gov.uk/documents/repeal-and-transitional-provisions.pdf>

²⁶ Commonwealth Secretariat. Handbook on Legislative Drafting (3rd ed.). Accessed October 23, 2025. <https://thecommonwealth.org/sites/default/files/inline/Law-Development-Legislative-Drafting-Handbook.pdf>

²⁷ Nigeria Revenue Service (Establishment) Act, 2025, s. 40(1)–(2)

of the Interpretation Act is incorporated to prevent contracts, legal instruments and proceedings, properly entered into or commenced under a previous law that has been repealed from being invalidated retroactively²⁸. This device serves to support the concept of legislative continuity and safeguard vested rights from statutory intrusion, a tenet well-established in Nigerian case-law which dictates that repeal cannot destroy accrued entitlements or subsisting obligations²⁹.

This continuity is further elucidated by section 41, which contains a complex savings and transitional provision that vest in the “Nigeria Revenue Service” all the “powers, rights, functions, obligations and other things of the Federal Inland Revenue Service (the Former Service)”³⁰. This clause guarantees that the new Service would receive not only the assets, but also the liabilities and obligations of its predecessor, eliminating any administrative gap in enforcing and collecting federal revenue. “The provisions of this Act,” reads section 41(b), “shall not take away or abridge rights and claims then existing, and all actions taken by the Secretary under any provision of Acts repealed by this Act... shall continue to subsist as if done under this Act³¹.” This ensures that earlier administrative steps and judicial processes are legally enforceable. The result is that the contractors and employees have continuity of legal relations without an interruption to the order of public governance or the collection of revenues. The legal structures serve as a clear orientation toward the institution reform on administrative justice and legal certainty.

²⁸ Interpretation Act, Cap. I23, Laws of the Federation of Nigeria, 2004, s. 6.

²⁹ N Tobi, *Statutory Interpretation: The Concept of Repeal and Transitional Effect* (Lagos: MIJ Publishers, 2016), p. 122.

³⁰ Nigeria Revenue Service (Establishment) Act, 2025, s. 41(a)–(b).

³¹ *Ibid.* s.41(b),

One important aspect of section 41 is its retention of continuity of service and tenure for officers and employees of the former Federal Inland Revenue Service. Subsections (c) and (d) specifically provide for the transfer of employment and offices of the Executive Chairman, Board members, Executive Directors, and all staff to the new Service “on at least such terms and conditions as are not less favourable than those applicable immediately before the commencement of this Act.”³² This safeguard of legislative protection from an employee perspective, secures the constitutional and equitable entitlements of employees, so that statutory alteration will not act to override current labour benefits or contractual rights. The stipulation preserves the principle of continuity of service while serving to protect public officers in a period of institutional change, following global administrative law norms. It reduces industrial unrest and maintains institutional stability while restructuring systems.

And, section 41(j) further states that “all rights, interests, obligations and liabilities of the Former Service existing immediately before the effective date of this Act under any contract or instrument shall be vested in to by the Service established under this Act”³³. Under this provision, the legal relationships are not disturbed and all obligations survive the law change, permitting contracts to be performed without breaking them. Also, subsection (k) makes such contracts binding “to all intents and purposes as if the Former Service... had been described in this Equipment Schedule or had been a party thereto.”³⁴ The general language in these subclauses highlights Parliament’s intent to avoid any void in the enforceability of obligations or entitlements and thus leave commercial and institutional confidence undisturbed, with regard to the government’s fiscal and legal responsibilities. Those clauses replicate

³² *Ibid.*, s. 41(c)–(d).

³³ Nigeria Revenue Service (Establishment) Act, 2025, s. 41(j)–(k).

³⁴ *Ibid.* s.(k)

similar transition provisions in the NNPC Act that also provided for continuity of rights and obligations following corporate reorganisation³⁵.

However, although art 41 preserves legal continuity, it gives rise to interpretative uncertainties. Subsection (g) for example states that enforcement proceedings commenced under the repealed Act “may be continued and disposed of under the repealed Act,³⁶” When proceedings extend into the life of the new Act, questions about which procedural regime governs are raised. The continuation of the repealed Act for enforcement purposes pursuant to (a) possibly contradicts that provision and creates an inconsistent dichotomy of procedures. Therefore, too, the mention of “Former Service” in several compartments by failing to define the institutional dimension of ‘service’ in s 42, could cause interpretative dissonance where one would decide issues regarding joint tax administration or devolution to subnational entities. These ambiguities may require judicial interpretation or administrative guidance in order to reconcile the transitional objective with procedural uniformity³⁷.

Additionally, section 41(f) saves “all notices, directions, rules, orders, regulations or other subsidiary legislation made under the repealed Act” without indicating its effect and time frame for revoking such notices³⁸. Such an open preservation could lead to regulatory uncertainty where earlier instruments contradict the purposes or procedural provisions of the new Act. For example, administrative circulars which were promulgated under the repealed Act may be incongruent with the

³⁵ Nigerian National Petroleum Company Limited Act, 2021, s. 54.

³⁶ Nigeria Revenue Service (Establishment) Act, 2025, s. 41(g).

³⁷ See also A F Uduebor, *Principles of Legislative Drafting and Interpretation* (Abuja: Juris Consult, 2023), 178.

³⁸ Nigeria Revenue Service (Establishment) Act, 2025, s. 41(f).

governance culture or structure inherent in Nigeria Revenue Service (established in 2025 that exists along Federal and Territorial Revenue Authorities. The fact that there is no clear rule to the harmonization clause may therefore put an obstacle on a successful shift to the new regime. For these reasons, it is suggested that the Board develop a comprehensive implementing directive pursuant to section 8(f) directed at rationally and equitably reconciling all current instruments of succession from previous Service.

4.0 Legal and Administrative Challenges in the Transition from FIRS to NRS

With the move of power from FIRS to NRS under the Nigeria Revenue Service (Establishment) Act, 2025 comes with many legal and administrative challenges that would arise due to this overlap in jurisdictions, transition uncertainties and institutional reordering. Here we outline six of such fundamental challenges that can arise in the process:

(i) Conflict of Jurisdictions between Federal and State Tax Departments

One such issue is one of control over certain tax heads under the transition phase. The NRS may now have a grip on taxes formerly handled by the state boards (under or in conjunction with JTBs). Such clashes could result in double assessments and lawsuits between federal and state entities. Without clear protocols and agreement among the intergovernmental agencies, these strains may undermine fiscal federalism and efficiency in taxation.

(ii) Employment and Staff Integration Disputes

Some former FIRS employees admitted into the new NRS status may generate questions about seniority, rank and accumulated entitlements. Transitional arrangements could save the vested rights, but ambiguity

regarding revised terms and conditions of service may lead to disputes or applications for redundancy. As regard to statutory reorganization, there is little guidance from the Public Service Rules and the Labour Act. A clear human resource dependencies and responsibilities is important in order to minimize complaints based on unfair labour practices, or constructive dismissal.

(iii) Continuity of Enforcement and Investigative Powers

Legal validity of current investigations, audits and prosecutions commenced under the repealed FIRS Act may be challenged at transition. The taxpayers or defendants may assert that NRS does not have the authority to litigate cases initiated by a terminated entity. Even though Section 41 (Savings and Transitional Provisions) endeavours to ensure continuity, interpretative indeterminacies linger in so far as “pending proceedings” are concerned. The courts may need to determine whether such powers automatically continue to exist or must be delegated anew under the new Act.

(iv) Ownership and Transfer of Taxpayer Data and Records

Data governance presents another administrative challenge as the vast database of the FIRS must be lawfully migrated to the NRS. The process raises concerns under the Nigeria Data Protection Act, 2023 regarding consent, confidentiality, and data security. Any unauthorized transfer or breach could expose the NRS to legal liability and reputational harm. Ensuring data integrity during system migration will therefore require technical oversight and strict compliance with digital governance standards.

v) Constitutional Issues Concerning the Exercise and Control of Executive Power:

The creation of NRS by an Act indicates a significant executive reorganisation in the matter of finance and is likely to draw

constitutional scrutiny. One might then ask whether the President acted upon granted or usurped powers in issuing his transitional direction. This could lead to a debate over the balance of powers between the Minister of Finance and the NRS Board, from where discussions about institutional independence might open. The courts' role would be to determine where those powers are in the separation of powers.

(vi) Issues of Intergovernmental Coordination and Policy Harmonization:

A recurrent question is how the NRS will engage with subnational revenue authorities to ensure that fragmented or competing tax systems do not emerge. Subnational fiscal regime in Nigeria requires harmonized revenue policies to be able to guarantee fairness and nonsaturation of the geometric bounds and tax avoidance through inter-jurisdictional leaks. At a minimum, without state by state guidelines for consultation and data sharing the transition may now promote administrative waste and taxpayer bewilderment. Experience in some contrasting countries, such as Kenya and South Africa, shows that a crucial element for successful reform outcomes is early harmonization mechanisms.

5.0 Conclusion and Recommendations

In conclusion, an examination of Sections 40 and 41 of the Nigeria Revenue Service (Establishment) Act, 2025, reveals that the legislature intended to ensure a legal continuity and institutional legitimacy during the transition from FIRS to NRS; however, there are some challenges that might make its smooth implementation different. The provisions are well-drafted but subject to interpretation, especially in relation to pending proceedings, contracts and rights accruing before the termination. The savings and transition provisions of the Act reflect common law principles, which are subject to judicial qualification in order that they not cause administrative confusion. The article

demonstrates that though repeal accomplishes statutory modernization, it reforms the financial terrain in ways that calls for sensitive interpretive oversight. It, therefore, further enhances the core argument that legalism should be amalgamated with administrative pragmatism in revenue administration and institutional transformation. Succinctly, the fate of the new regime lies on how expeditiously they are implemented by relevant authorities and, ultimately, how the judiciary interpret these provisions in application. Hence, the study pragmatically recommends as follows:

First, detailed interpretative guidelines on the meaning of “pending rights, liabilities and proceedings” should be issued by the Federal Ministry of Finance to achieve consistency between administrative application and court decisions. These are to be considered definitive sources for officers carrying out transitional actions under the new Act.

Second, the judiciary could establish that the doctrine of continuity expresses a positive obligation on courts to make such a declaration so as to avoid conflicting post-transitional decisions which compromise the statutory purpose. This sort of judicial intervention would serve to strengthen the legality of administrative action executed under the transitional order.

Third, all NRS employees should receive substantive training to adequately prepare them for the new statutory structure and the procedural requirements that accompany it. It would reduce chances of maladministration and ensure professional cohesion among the reorganised agency.

Fourth, public awareness campaigns should be undertaken to educate taxpayers and stakeholders on the effect of the institutional change, such as the credibility of existing tax assessments and liabilities. The more

the public knows, the more voluntarily compliant they are likely to be, and the fewer disputes may arise from misreadings of the statute.

Fifth, it shall be necessary to reconcile the NRS Act with prevailing tax legislations including CIT, VAT and PITAs for avoidance of duplication or conflict. This legislative synchronization, will reinforce the Nigerian fiscal governance architecture, and provide for a coordinated, transparent legal framework for tax administration in Nigeria.

AJLR (2025) Vol. 3, No. 1