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TOURISM GOVERNANCE, PROFESSIONAL REGULATION, AND SUSTAINABLE DEVELOPMENT: INTERROGATING NIGERIA'S 2022 NIHOTOUR ACT

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Abstract

This study critically examines the implications of Nigeria's National Institute for Hospitality and Tourism (Establishment) Act, 2022 (NIHOTOUR Act), in the context of tourism governance, professional regulation, and sustainable development. While the Act aims to standardize training, certification, and practice within the tourism and hospitality industry, it has generated significant controversy among stakeholders due to its top-down enforcement strategy and limited stakeholder engagement. Drawing on secondary data, the research analyzes the legal and institutional framework of the Act, stakeholder responses, its alignment with global regulatory standards and the Sustainable Development Goals (SDGs), particularly Goals 8 and 16, and identifies gaps in governance and implementation. Findings reveal that although the Act aspires to professionalize the industry, it suffers from rigid regulatory architecture, weak participatory governance, and limited alignment with international sustainability benchmarks. The study concludes with policy recommendations aimed at fostering inclusive, adaptive, and collaborative regulatory frameworks to advance Nigeria's tourism industry toward sustainable development.

Keywords:

Tourism Governance, Professional Regulation, NIHOTOUR Act, Sustainable Development, Nigeria

Introduction

Tourism has emerged globally as a transformative industry with far-reaching implications for economic growth, employment generation, cultural preservation, and international cooperation. In developing countries like Nigeria, tourism is increasingly viewed as a strategic pillar for diversifying the economy beyond oil dependence. However, the sector remains beset by challenges, including weak institutional governance, lack of professional standards, and fragmented regulatory oversight (Olufunke et al. 2022). To address some of these gaps, the Federal Government of Nigeria enacted the National Institute for Hospitality and Tourism (Establishment) Act, 2022 (NIHOTOUR Act), which seeks to standardize professional practice through training, certification, and registration mechanisms.

The NIHOTOUR Act introduces far-reaching mandates including compulsory registration of hospitality and tourism personnel, inspection rights, licensing frameworks, and disciplinary enforcement (NIHOTOUR Act, 2022). While these provisions align with global trends in sectoral regulation, their implementation has been met with resistance from stakeholders such as the Association of Tourism and Hospitality Consultants in Nigeria (ATHCON). ATHCON contends that the Act, and particularly its method of enforcement, undermines existing industry structures, disregards stakeholder engagement, and risks exacerbating the very governance issues it intends to solve (Tribune Online, 2024; Voice of Nigeria, 2024).

Given these tensions, this study critically interrogates the NIHOTOUR Act in relation to Nigeria's broader tourism governance framework, professional regulatory practice, and sustainable development agenda.

The primary aim of this study is to interrogate the implications of the 2022 NIHOTOUR Act for tourism governance, professional regulation, and sustainable development in Nigeria.

To achieve the stated aim, the study will pursue the following specific objectives:

1. To examine the regulatory and governance provisions of the 2022 NIHOTOUR Act in the context of Nigeria's tourism sector.
2. To analyze stakeholder responses and concerns regarding the enforcement and legitimacy of the Act.
3. To assess the alignment of the Act with global regulatory standards and the United Nations Sustainable Development Goals (SDGs), especially Goals 8 and 16.
4. To identify governance gaps and make recommendations for inclusive, professional, and sustainable tourism regulation in Nigeria.

To guide the inquiry, the following research questions are posed in direct alignment with the study's objectives:

1. What are the key governance and regulatory provisions of the 2022 NIHOTOUR Act for the tourism sector in Nigeria?
2. How have stakeholders in the tourism and hospitality industry responded to the Act and its enforcement strategies?
3. To what extent does the NIHOTOUR Act align with international regulatory best practices and the relevant Sustainable Development Goals (SDGs)?
4. What governance gaps or policy challenges are evident in the implementation of the NIHOTOUR Act?

Despite its legal articulation of standards, the NIHOTOUR Act of 2022 is mired in controversy. Its implementation has exposed a fault line between government intent and industry realities. Several stakeholders argue that the Act enforces a top-down regulatory model that marginalizes existing professional bodies, lacks adequate sensitization, and risks legal overlap with other institutions (Eyisi & Okpoko, 2023; Charity & Bale, 2024). Furthermore, concerns have been raised about the administrative competence and reach of NIHOTOUR to effectively implement the sweeping provisions of the Act. Without careful review, these concerns could undermine the goal of building a professionalized and sustainably governed tourism sector in Nigeria.

This study focuses on the legal, professional, and governance dimensions of the NIHOTOUR Act (2022). It examines the scope, application, and institutional mechanisms prescribed by the Act and evaluates the implications for tourism development across Nigeria. The geographic emphasis will be on Abuja and Lagos—urban hubs with the highest concentration of tourism establishments—where the enforcement and opposition to the Act have been most visible. The study will draw from primary legal documents, academic literature, and stakeholder publications from 2022 to 2024.

The study is significant for several reasons. First, it contributes to a growing body of knowledge on tourism governance and regulatory frameworks in Africa. Second, it offers timely insights into how professional regulation, when poorly implemented, can generate legal and institutional conflict. Third, the findings will be beneficial to policymakers, regulatory institutions, and industry practitioners seeking a more coherent and collaborative approach to sectoral reform. Finally, it aligns with national development priorities that seek to unlock the economic potential of tourism while maintaining ethical and professional standards.

Tourism regulation, when executed through inclusive governance and ethical professionalism, is a known driver of sustainable development. The United Nations World Tourism Organization (UNWTO) and the Global Code of Ethics for Tourism emphasize the importance of competent institutions and professional integrity in achieving the Sustainable Development Goals (SDGs). Specifically, SDG 8 advocates for *decent work and economic growth*, while SDG 16 promotes *peace, justice, and strong institutions*. The NIHOTOUR Act must therefore be critically evaluated to determine whether it advances or hinders these global commitments. In addition, previous studies (e.g., Uwagboe, 2023; Olekanma & Ekanem, 2023) have documented Nigeria's fragmented tourism governance history and called for integrative regulatory reforms. This study answers that call by interrogating a landmark legislative development with potentially transformative implications.

Literature Review

Tourism Governance

The discourse on tourism governance has evolved significantly over the past two decades, moving from administrative control toward participatory, and multi-level approaches. At the heart of this evolution is the recognition that governance in tourism is not solely about government action, but rather a network of institutions, policies, actors, and processes that collectively shape the development and regulation of the sector. In this light, governance is central to achieving both performance outcomes and sustainability within tourism systems. Saarinen and Hall (2025) argue that good governance in tourism must be built upon key principles such as transparency, accountability, stakeholder inclusiveness, and institutional adaptability. These principles are vital for addressing the complex interdependencies in tourism, particularly in developing contexts

where tourism intersects with heritage, livelihoods, infrastructure, and environmental management. They emphasize that centralized regulation, when disconnected from local realities and stakeholder interests, often fails to foster legitimacy or effectiveness.

In a similar vein, Rasoolimanesh et al. (2024) offer a metagovernance framework that stresses the need to coordinate diverse actors, governments, industry practitioners, professional associations, and local communities within an integrated model of sustainable tourism governance. Their findings affirm that hierarchical, top-down regulatory systems can undermine innovation, reduce compliance, and alienate the very professionals and communities they aim to regulate. These theoretical perspectives resonate deeply with current controversies surrounding Nigeria's NIHOTOUR Act (2022), which has been criticized for its centralized enforcement strategies and lack of adequate stakeholder engagement. Zhang et al. (2024), in their systematic review of governance strategies in disaster-prone tourism destinations, further illustrate the limitations of rigid institutional frameworks. They emphasize that effective governance must be responsive and resilient, capable of adjusting to contextual risks and uncertainties. In the Nigerian case, the resistance to NIHOTOUR's enforcement activities particularly by professional associations like ATHCON demonstrates not only a lack of consensus but also an absence of institutional agility in the governance design.

Empirical studies within the Nigerian context reinforce these concerns. Uwagboe (2023) traces the history of tourism governance in Nigeria and concludes that institutional fragmentation, overlapping mandates, and poor inter-agency coordination have long undermined coherent policy implementation. Despite a growing corpus of tourism laws and agencies, he notes, the sector continues to suffer from regulatory inefficiencies and a disconnect between federal instruments

and subnational realities. This fragmentation is evident in the operationalization of the NIHOTOUR Act, which lacks a clear framework for harmonizing its provisions with state-level policies and the roles of existing professional bodies. Adetola et al. (2024) extend this critique through their assessment of the performance of Nigerian heritage sites under existing tourism policies. They find that while legal instruments and strategies are in place, they often do not translate into improved site management or stakeholder inclusion. Instead, inconsistent enforcement, poor institutional coordination, and weak governance accountability persist. Their study provides evidence that tourism legislation, without integrated governance structures and clear implementation pathways, risks becoming symbolic rather than transformative.

These issues are not without attempts at reform. The recent creation of a standalone Ministry of Tourism in Nigeria was celebrated as a bold leap forward by the UN World Tourism Organization (2024). However, legal analysts, such as those at Lexavier Partners (2024), caution that regulatory expansion must be matched with clarity in legal frameworks and coordination among institutions to avoid deepening confusion and conflict. Related open-access studies (Longdom, 2024; AIR Journal, 2024) similarly warn that tourism governance reforms in Nigeria often lack adequate stakeholder dialogue, making even well-intentioned policies difficult to enforce or sustain. Despite the wealth of literature on tourism governance and policy, there remain notable gaps that this study aims to address. First, while several scholars acknowledge governance deficiencies in Nigeria's tourism sector, few have critically examined the NIHOTOUR Act as a focal legal instrument through the lens of sustainable tourism governance. Second, existing research often fails to connect these governance concerns directly with the imperatives of professional regulation and sector-wide institutional collaboration. Lastly, there is limited scholarly engagement with how national legislation, such as the NIHOTOUR Act, aligns or fails to align with global frameworks like the

Sustainable Development Goals, especially SDG 8 on decent work and economic growth and SDG 16 on strong institutions. This study thus positions itself to interrogate these gaps by critically evaluating the NIHOTOUR Act within the broader landscape of tourism governance in Nigeria. It explores the extent to which the Act promotes or impedes inclusive regulation, professional standards, and sustainability, drawing from both global governance theory and empirical realities within Nigeria's tourism and hospitality environment.

Professional Regulations in Tourism

Professional regulation in the tourism and hospitality sector plays a critical role in defining industry standards, enhancing service quality, and fostering sustainable development. Across jurisdictions, regulatory frameworks are designed not only to uphold competence and ethical conduct but also to ensure that tourism professionals contribute meaningfully to national economic strategies and global competitiveness. However, the structure, intent, and impact of such regulation vary significantly depending on the legal tradition, institutional context, and stakeholder dynamics in each country.

Anđelković and Ivaniš (2022) argue that professional regulation is not merely a compliance mechanism, but a strategic component of broader financial and operational governance in tourism. They emphasize that well-articulated regulatory standards help stabilize sectoral performance and attract responsible investment. In this view, regulation extends beyond licensing and touches on financial reporting, human resource development, and strategic planning. Their insights are particularly relevant for countries like Nigeria, where the tourism sector is being repositioned as a catalyst for post-oil economic growth.

However, legal systems often struggle to balance regulation with the agility required for innovation and inclusive participation. Agafonova and Spektor (2022) observe that many post-Soviet and emerging economies face challenges in harmonizing tourism regulations across different administrative tiers, resulting in legal inconsistencies and enforcement difficulties. These findings echo the Nigerian experience, where the *NIHOTOUR Act (2022)* seeks to professionalize tourism and hospitality practice but has faced resistance from industry stakeholders who argue that it lacks legal synergy with existing state laws and professional frameworks.

Tatsiienko et al. (2021) take the discourse further by highlighting the implications of inadequate legal regulation on safety and public interest. Their study frames professional regulation as a tool not just for quality assurance, but for mitigating legal risks, safeguarding tourists, and protecting national reputations. In Nigeria, where the hospitality industry operates amid structural and security challenges, the absence of coherent professional oversight has led to service inconsistencies and reputational vulnerabilities. The *NIHOTOUR Act* attempts to correct this gap, yet its implementation raises questions about institutional readiness and regulatory legitimacy.

Seyitoglu et al. (2025), in their recent work on (de)regulating tourism professions in Portugal, introduce a cautionary perspective. They argue that excessive professional regulation, especially when applied without stakeholder consultation, can restrict labor mobility, discourage entrepreneurship, and lead to regulatory capture. Their findings underscore the importance of balance: professional regulation must protect public interest and industry standards without becoming a barrier to innovation or participation. This is especially salient in Nigeria's context, where the *NIHOTOUR Act* has been criticized for its top-down approach and perceived exclusion of longstanding professional bodies such as ATHCON and FTAN.

The theoretical link between professional regulation and sustainable tourism has also been explored in local Nigerian scholarship. Charity and Bale (2024) note that without structured professional oversight, the hospitality industry in Nigeria risks stagnation and international irrelevance. However, they caution that regulatory reforms must be informed by local realities and driven by inclusive consultation. Likewise, Olekanma and Ekanem (2023) emphasize that professional regulation can spur innovation and performance in Nigerian hotels, but only if it respects the autonomy of practitioners and promotes capacity building rather than compliance for its own sake.

While these studies provide valuable insights into the benefits, limitations, and design of professional regulation globally and locally, a significant scholarly gap remains. Most existing research discusses regulation in abstract terms or evaluates fragmented legal instruments without deeply interrogating how a comprehensive national law—like Nigeria’s NIHOTOUR Act—functions as a professional governance tool. Additionally, there is limited empirical exploration of the tensions between state-led regulation and industry-led self-regulation in the Nigerian context. No current study fully examines how such regulatory frameworks align with international governance norms or contribute to the realization of Sustainable Development Goals (particularly SDGs 8 and 16).

This study addresses that gap by analyzing the NIHOTOUR Act (2022) as both a legal and institutional intervention in Nigeria’s tourism governance. It examines the content of the Act, the politics of its enforcement, and its broader implications for professional standards, stakeholder inclusion, and sustainable sectoral development. By situating the Act within global debates on

regulation and professional autonomy, the study contributes to a more nuanced understanding of how national legislation can support or hinder tourism governance in emerging economies.

Sustainable Development

Sustainable development has evolved from a largely environmental agenda to a multidimensional framework encompassing economic viability, social equity, and ecological integrity. Within tourism, this evolution has generated extensive discourse on how the sector can align with the United Nations Sustainable Development Goals (SDGs), especially in emerging economies where tourism is increasingly viewed as a tool for national transformation. Scholars and practitioners agree that achieving true sustainability in tourism requires institutional innovation, stakeholder inclusivity, and measurable commitment to ethical governance and accountability.

Buhalis et al. (2023) provide a comprehensive examination of how tourism, when governed effectively, can serve as a vehicle for achieving the 2030 Sustainable Development Goals. Their work emphasizes the integrative nature of tourism: it simultaneously affects and is affected by health systems, education, infrastructure, gender equity, biodiversity, and decent work. Importantly, the authors stress that achieving SDG-aligned tourism is not simply about increasing tourist numbers or building infrastructure but about embedding sustainability in governance models, business practices, destination planning, and local livelihoods. Their findings are particularly relevant to Nigeria, where recent legislation such as the NIHOTOUR Act is positioned as a mechanism for regulating the sector, yet remains contested in terms of its inclusivity and developmental orientation.

In a broader regional study, Sadiq et al. (2023) explore the role of Environmental, Social, and Governance (ESG) indicators in driving sustainability across ASEAN countries. They demonstrate that countries with stronger ESG frameworks are significantly more likely to meet SDG targets across various sectors, including tourism. Their research reveals that sustainability cannot be achieved by environmental conservation alone but must involve coherent governance, social accountability, and transparency. These insights highlight a critical gap in Nigeria's tourism sector: while the country has made some progress on environmental conservation and professionalization, its social and institutional governance frameworks remain fragmented and often disconnected from sustainability principles.

Adding another layer to the understanding of sustainability, Hariram et al. (2023) introduce the concept of "Sustainalism", an integrated socio-economic-environmental model that connects policy, practice, and impact in a feedback loop. Their framework challenges the compartmentalization of sustainability into discrete goals and instead promotes a systemic, holistic approach. This perspective reinforces the argument that legal and professional instruments like the NIHOTOUR Act must be viewed not only through a compliance lens but as part of a broader governance strategy that enables sustainability across the sector. Laws that do not engage social actors, lack adaptive governance mechanisms, or neglect to integrate socio-economic realities are unlikely to foster sustainable development, no matter how well-intentioned.

Together, these studies highlight a number of important themes. First, sustainable tourism development depends not only on infrastructure or certification but on strong, inclusive, and adaptive institutions. Second, effective governance—including clear professional regulations, stakeholder dialogue, and ESG principles—plays a pivotal role in ensuring the tourism industry

contributes meaningfully to sustainable development. Third, fragmented or top-down approaches to regulation, such as those criticized in Nigeria's recent tourism policies, risk undermining the very sustainability they aim to achieve.

What is notably absent from the current literature is a focused analysis of how national professional legislation, such as Nigeria's NIHOTOUR Act, aligns with or diverges from these sustainability principles. While global and regional studies provide macro-level insights, there remains a gap in empirical and policy-driven research that connects the micro-mechanics of tourism regulation to broader sustainability outcomes—particularly in sub-Saharan Africa. This study addresses that gap by examining whether and how the NIHOTOUR Act supports or hinders Nigeria's commitment to sustainable development in the tourism and hospitality sectors, using the SDGs as an evaluative framework.

Methodology

This study adopts a qualitative research design to explore the implications of the NIHOTOUR Act (2022) on tourism governance, professional regulation, and sustainable development in Nigeria. A qualitative approach is appropriate for this research because it enables a deep and nuanced understanding of the legal, institutional, and stakeholder dynamics that surround tourism regulation—factors that are often complex and cannot be meaningfully analyzed using quantitative methods.

The research relies entirely on secondary data. Relevant documents were sourced from official government publications, academic journals, legal texts, professional association reports, policy briefs, and reputable media platforms. Special attention was given to the NIHOTOUR

Establishment Act of 2022, as well as stakeholder responses from bodies such as the Association of Tourism and Hospitality Consultants in Nigeria (ATHCON) and the Federation of Tourism Associations of Nigeria (FTAN). In addition, recent scholarly work on tourism governance, professional regulation, and sustainable development goals was reviewed to provide context and support for analysis.

Data collection involved a targeted search using academic databases and trusted online platforms. Keywords such as "NIHOTOUR Act," "tourism governance in Nigeria," "professional regulation in hospitality," and "sustainable tourism policy" guided the selection of materials. Only sources that were recent, credible, and directly relevant to the study's objectives were considered.

For data analysis, thematic analysis was employed. This involved carefully reading the documents and identifying key patterns, trends, and recurring themes. Specific focus was placed on how the NIHOTOUR Act is structured, how it is perceived and received by industry stakeholders, the degree to which it aligns with principles of good governance and sustainability, and its potential impact on the tourism and hospitality workforce. These themes were then critically examined in relation to the research questions and objectives of the study.

To enhance validity and credibility, all information was cross-checked across multiple sources. Only peer-reviewed academic articles, government-issued documents, and official statements from recognized professional organizations were used to support the analysis and conclusions. By triangulating data in this manner, the study ensures that the findings are both reliable and grounded in evidence.

Discussion of Findings

Research Question 1: What are the key governance and regulatory provisions of the 2022 NIHOTOUR Act for the tourism sector in Nigeria?

The NIHOTOUR Act (2022) is designed as a centralized legal instrument to standardize training, certification, and professional practice within Nigeria’s tourism and hospitality sector. Its provisions vest regulatory authority in the National Institute for Hospitality and Tourism, allowing it to accredit training institutions, issue professional licenses, and enforce compliance across the sector. However, in line with global governance principles, this model reflects a rigid, hierarchical structure that contrasts with more contemporary models of distributed and adaptive governance. For example, Sarhan et al. (2024) emphasize that effective tourism governance increasingly depends on multi-stakeholder partnerships and shared regulatory responsibility, especially in complex environments. By contrast, the NIHOTOUR Act shows minimal incorporation of such collaborative mechanisms, limiting its ability to accommodate sectoral diversity and localized practices. This reflects a regulatory philosophy more focused on control than coordination—a significant gap in its governance architecture.

Research Question 2: How have stakeholders in the tourism and hospitality industry responded to the Act and its enforcement strategies?

Stakeholder response to the NIHOTOUR Act has been largely critical, particularly among professional bodies and tourism operators who feel excluded from its formulation and implementation. Groups such as the Association of Tourism and Hospitality Consultants in Nigeria (ATHCON) and the Federation of Tourism Associations of Nigeria (FTAN) argue that the Act imposes top-down regulation without adequate industry consultation, thereby undermining sectoral autonomy. Meyer and Rheeders (2024), in their study on governance in South Africa,

emphasize that stakeholder inclusion and trust in public institutions are key enablers of successful tourism policy. Their findings suggest that tourism governance must not only enforce standards but also foster collaborative relationships with industry actors. In the Nigerian case, the absence of dialogue and transparent engagement has resulted in resistance and policy pushback, reflecting a breakdown in participatory governance and undermining the potential benefits of professional regulation.

Research Question 3: To what extent does the NIHOTOUR Act align with international regulatory best practices and the relevant Sustainable Development Goals (SDGs)?

The NIHOTOUR Act currently demonstrates limited alignment with international regulatory best practices and the UN Sustainable Development Goals. While the Act attempts to professionalize the sector, it lacks explicit commitments to principles such as environmental sustainability, institutional accountability, and inclusive economic growth—hallmarks of global tourism governance frameworks. Rakadjiiska (2024) highlights how European tourism policy has evolved to integrate social, ecological, and digital standards into regulatory frameworks, providing direction for sustainable tourism development. Similarly, Sveinsdóttir et al. (2025) advocate for adaptive governance, particularly in rapidly changing or contested contexts like tourism. They argue for flexible, learning-based policy structures that can respond to stakeholder feedback and environmental shifts. The NIHOTOUR Act, in contrast, appears static and overly prescriptive, with no built-in mechanisms for iterative evaluation or local adaptation. As such, its contribution to SDG 8 (decent work and economic growth) and SDG 16 (peace, justice, and strong institutions) remains aspirational rather than operational.

Research Question 4: What governance gaps or policy challenges are evident in the implementation of the NIHOTOUR Act?

The analysis reveals several governance gaps in the structure and implementation of the NIHOTOUR Act. Chief among them is the lack of an adaptive, context-sensitive framework that allows for policy refinement, local adaptation, and inter-agency coordination. Although the Act establishes clear roles for NIHOTOUR, it does not define how the institution will engage state-level tourism boards, professional associations, or the private sector in co-regulation. This undermines coherence and leads to regulatory overlaps—a challenge previously documented in Nigerian tourism policy history. Drawing from the Arctic experience, Sveinsdóttir et al. (2025) demonstrate that adaptive governance models—which emphasize flexibility, local knowledge integration, and iterative learning—are better suited to managing tourism in complex, dynamic environments. Nigeria’s tourism sector, marked by rapid urban growth, informal operators, and regional diversity, requires similarly adaptive tools. The NIHOTOUR Act’s current design lacks the structural elasticity to meet these demands, raising concerns about its long-term efficacy and sectoral acceptance.

Discussion of Findings

The analysis of the regulatory and governance provisions of the NIHOTOUR Act revealed several significant insights. Firstly, while the Act establishes a framework for national tourism training and regulation, it currently lacks an inclusive governance model that accommodates the diversity of stakeholders in Nigeria's tourism sector. The absence of formal roles for state tourism agencies, private sector actors, and professional associations limits institutional coordination and weakens

policy legitimacy. The lack of shared governance has led to fragmented implementation and regulatory overlaps.

Secondly, stakeholder responses to the Act suggest limited engagement mechanisms. Industry operators, unions, and training institutions report minimal opportunities to influence policy direction, certification standards, and compliance procedures. This top-down approach fosters mistrust and creates resistance among those directly affected by the regulatory environment. The lack of a structured consultation process undermines the effectiveness of tourism policy execution.

Thirdly, the Act does not fully align with international best practices or reflect current global sustainability trends. It lacks explicit provisions for sustainability and Environmental, Social, and Governance (ESG) principles, which are increasingly being adopted by tourism regulators worldwide. Its disconnection from relevant Sustainable Development Goals (SDGs), particularly SDG 8 (decent work and economic growth) and SDG 16 (peace, justice, and strong institutions), demonstrates a gap in its strategic alignment with global development objectives.

Lastly, governance gaps were identified, especially in the areas of adaptive regulation and capacity development. The rigid and uniform application of the Act across diverse regional contexts undermines its effectiveness. Moreover, the Act does not provide sufficient mechanisms for feedback, periodic review, or professional support for compliance. This weakens the institutional learning process and impedes the development of a competent tourism workforce across the nation.

Conclusion

The current implementation of the NIHOTOUR Act, while foundational in regulating tourism training and practices in Nigeria, reveals several structural and operational deficiencies. These

include insufficient stakeholder inclusion, limited consultation frameworks, a lack of sustainability integration, and inadequate adaptive governance mechanisms. The Act, in its current form, falls short of promoting collaborative governance, national policy cohesion, and alignment with international standards. Without reform, these gaps will continue to hinder the growth and professionalization of the tourism and hospitality sector in Nigeria. Therefore, a multi-dimensional policy review that emphasizes shared governance, sustainability, and adaptive implementation is essential for transforming NIHOTOURL into a dynamic and effective institution.

Recommendations

1. **Promote Shared Governance and Institutional Coordination:** Revise the NIHOTOURL Act to institutionalize the participation of key stakeholders such as state tourism agencies, professional associations, and the private sector. Establish a multi-level governance model that encourages coordination across federal, state, and local levels to reduce regulatory overlaps and promote policy cohesion.
2. **Establish a Permanent Stakeholder Consultation Platform:** Create a structured and permanent platform for regular dialogue between NIHOTOURL and tourism stakeholders, including unions, training institutions, and industry operators. Use this platform to discuss regulatory changes, certification models, professional development opportunities, and compliance mechanisms. Ensure that feedback from stakeholders is formally documented and integrated into policy processes to enhance transparency and inclusiveness.
3. **Integrate Sustainability and ESG Principles:** Update the Act to explicitly incorporate sustainability indicators and ESG principles in line with international tourism standards. Align the

regulatory framework with SDG 8 (promoting decent employment and economic growth) and SDG 16 (ensuring strong and inclusive institutions). Promote gender inclusion, decent work, and environmentally responsible tourism practices as part of NIHOTOUR's strategic priorities.

4. **Adopt Adaptive Governance Mechanisms:** Institute a dynamic governance approach that includes regular policy reviews, feedback mechanisms, and regional customization of regulations. Develop and implement capacity-building programs in collaboration with state governments, tourism associations, and the private sector. Support tourism professionals and institutions through ongoing training, certification, and mentorship programs aimed at professional growth and regulatory compliance.

5. **Monitor and Evaluate Implementation:** Establish a monitoring and evaluation (M&E) framework to assess the effectiveness of the revised Act and its implementation strategies. Use data-driven tools to track stakeholder engagement, training outcomes, and sustainability impacts. Encourage a culture of continuous learning and improvement within NIHOTOUR and its affiliated institutions.

Limitations of the Study

This study is limited by its reliance on secondary data sources such as policy documents, academic literature, and media reports. While these sources offer valuable insights, the absence of primary

data, such as interviews or surveys with stakeholders, means that some perspectives, particularly from grassroots operators, may not be fully captured.

Additionally, the study focuses primarily on the national framework of the NIHOTOUR Act and its implications for governance and professional regulation. It does not provide a detailed comparative analysis with state-level tourism laws or region-specific practices, which may vary across Nigeria's diverse geopolitical zones.

Areas for Further Research

Future research could include empirical studies involving interviews or focus groups with tourism professionals, policymakers, and operators to gather firsthand perspectives on the enforcement and impact of the NIHOTOUR Act. This would deepen understanding of stakeholder experiences and enrich policy recommendations.

Moreover, comparative studies between Nigeria and other African or Global South countries with similar tourism regulatory frameworks could provide useful lessons on how national legislation can better align with sustainability goals, institutional realities, and professional development across different contexts.

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