

Assessing Subnational Climate Policy Alignment in Nigeria: Evidence from Jigawa State and a Comparative Analysis with Katsina State

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ABSTRACT

Jigawa State published its first dedicated Climate Change Policy (JSCCP) in January 2026, presenting it as aligned with Nigeria's National Climate Change Policy (NCCP, 2021–2030) and Third Nationally Determined Contribution (NDC 3.0), transmitted to the UNFCCC in September 2025. This study evaluates that claim through a criterion-based comparative document analysis. The vertical comparison assesses JSCCP against the NCCP and NDC 3.0, while the horizontal comparison examines the Katsina State Green Growth Agenda (KAGGA), drawing on contemporaneous secondary evidence because its primary text was not publicly accessible. Using a three-category alignment framework full, partial, and misalignment—the analysis finds that JSCCP's institutional architecture is fully aligned with the national model established under the Climate Change Act, 2021. Its adaptation and agriculture provisions are partially aligned, while its most quantifiable mitigation commitment renewable energy is misaligned, as it reproduces targets from Nigeria's 2021 Updated NDC rather than the updated figures in NDC 3.0. The Katsina comparison suggests that its governance model, earmarked financing mechanism, and externally validated ranking provide more visible accountability mechanisms than JSCCP currently offers, although causal links between the ranking and reported funding increases cannot be established. Both policies share a structural challenge identified in NDC 3.0: financing ambitions exceed documented subnational institutional capacity, alongside the absence of operational subnational greenhouse gas inventories and public MRV platforms. The study recommends reconciling JSCCP targets with NDC 3.0, strengthening subnational MRV capacity, and institutionalising independent climate-governance assessment..

Received: 24 Aug. 2026

Accepted: 14 Sep. 2026

Published: 22 Sep. 2026

Keywords:

Subnational climate governance; Policy alignment; Jigawa State Climate Change Policy; Nationally Determined Contribution; Multilevel governance; Nigeria

INTRODUCTION

Jigawa State is among Nigeria's most climate-exposed northern states, situated within the Sudano-Sahelian ecological zone and designated one of eleven federal “frontline states” for desertification under the Great Green Wall programme. The state's dependence on rain-fed agriculture, combined with recurrent flooding and advancing land degradation, has produced measurable losses: 106,821 hectares of farmland were affected by flooding in 2021 alone, and 18 of the state's 27 Local Government Areas experienced flooding during Nigeria's worst flood year in a decade in 2022 (Jigawa State Government, 2026, pp. 20–21). Against this backdrop, the Jigawa State Government published its first dedicated Climate Change Policy (JSCCP) in January 2026. The document presents itself, in several places, as an instrument that operationalises national commitments at the state level, stating that it aligns with “Nigeria's National Climate Change Policy and the Nigeria Nationally Determined Contributions” and repeatedly invoking a document it describes as “NDC3.0 (2025)” as the source of localised sectoral targets (Jigawa State Government, 2026, pp. 12–13, 28–30).

That claim is an empirical proposition, not a rhetorical flourish, and it can be tested directly against the primary texts it invokes. Two features of Nigeria's climate governance architecture make the test worth conducting. First, the Climate Change Act, 2021 establishes a National Council on Climate Change with a coordinating, rather than directly

implementing, mandate over sectors agriculture, land use, water resources, and urban planning among them, where substantial policy and administrative responsibility is exercised at state level; national mitigation and adaptation outcomes are therefore substantially dependent on how faithfully state policies translate national commitments into local action (Federal Republic of Nigeria, 2021). Second, Nigeria's actual Third Nationally Determined Contribution was not finalised until September 2025 and was formally transmitted to the UNFCCC that month four months before JSCCP's own publication (National Council on Climate Change [NCCCC], 2025). Whether a state policy published in January 2026 reflects the targets Nigeria had adopted the previous September, or instead recycles figures from the 2021 National Climate Change Policy (NCCP) and the earlier, 2021 Updated NDC while adopting NDC 3.0's name, is a question that can be answered by direct textual comparison. The available evidence on how Nigerian states generally perform on this dimension is not favourable. In the most comprehensive assessment of climate governance across all 36 Nigerian states and the Federal Capital Territory, Okereke et al. (2025) found that only seven states and the FCT had a publicly accessible climate policy document, that most existing state policies were “misaligned with the national climate policy framework,” and that they typically consisted of “a long list of intended actions with no quantification of emissions and limited or no clear connection to the delivery of national or global climate targets” (Okereke et al., 2025).

Fewer than one state in five had a climate action plan containing a measurable target, and only six states maintained a dedicated climate budget line. The same study places Jigawa among the states with both an accessible policy framework and an existing climate budget provision at the time of the survey, and among the states whose respondents reported relatively high public climate awareness (Okereke et al., 2025). This position Jigawa closer to the small cohort of proactive states than to the national median, which raises the more specific question this paper investigates: does that institutional head start correspond to substantive alignment with the current national framework, or principally to structural and rhetorical alignment?

A second, comparative gap concerns how Jigawa's approach compares with a similarly exposed peer state. Katsina State, Jigawa's western neighbour and a fellow Great Green Wall frontline state, launched the Katsina State Green Growth Agenda (KAGGA) in April 2025 and was subsequently ranked second nationally in the 2025 Subnational Climate Governance Performance Rating and Ranking, an assessment jointly produced by the Society for Planet and Prosperity (SPP) and the Department of Climate Change at the Federal Ministry of Environment (SPP, 2025; News Diary Online, 2025). Two adjacent, ecologically comparable, similarly resource-constrained states adopted visibly different institutional approaches within the same policy cycle, which makes a paired comparison analytically useful: it holds ecological and federal context constant and isolates the effect of state-level institutional design choices.

This study addresses two research questions. First, does JSCCP substantively operationalise the National Climate Change Policy (2021–2030) and Nigeria's actual NDC 3.0? Second, how does JSCCP compare with Katsina's KAGGA in institutional architecture, financing mechanism, and public accountability provision, and what can that comparison establish given the asymmetric availability of primary source material? To our knowledge, this is the first study to test a Nigerian subnational climate policy's alignment claims directly against the post-NDC 3.0 national framework using primary-text analysis, combined with a horizontal comparison against a peer frontline state. In doing so, it moves beyond descriptive summary of a newly published policy toward a structured, criterion-based test of the alignment claims Nigerian state governments increasingly make when introducing subnational climate instruments.

MATERIALS AND METHODS

Conceptual and Analytical Framework

This study situates JSCCP within a multilevel climate governance framework, in which national commitments under the UNFCCC and the Climate Change Act, 2021 are expected to be translated into subnational instruments that carry equivalent or complementary targets, timelines, and institutional mechanisms (Federal Republic of Nigeria, 2021; Okoli, 2024). Within this framework, the central analytical concept used throughout the paper is policy alignment, which we define, for the purposes of this study, as the extent to which a subnational policy's objectives, targets, implementation mechanisms, and monitoring arrangements correspond with the objectives, quantitative targets, timelines, and institutional requirements established by the current national climate policy framework. This definition is operationalised through a three-category classification applied to each comparable provision identified in JSCCP:

- i. Full alignment: the state commitment corresponds to the current national commitment in objective, timeframe, and measurable target.

- ii. Partial alignment: the state policy addresses the same substantive issue as the national framework but does not attach a corresponding quantitative or time-bound commitment, or attaches one that cannot be directly checked against a national figure.

- iii. Misalignment: the state policy adopts a specific target that conflicts with, or is derived from, a national commitment that has since been superseded.

This classification is applied only where JSCCP explicitly claims, or clearly implies, correspondence with a national instrument; provisions with no stated national referent are described but not classified. A second, related construct used in the analysis is accountability infrastructure, comprising the monitoring, reporting, verification, and public disclosure mechanisms through which a stated commitment could, in principle, be checked against actual performance. Both constructs are applied identically to the vertical (JSCCP–NCCP–NDC 3.0) comparison; the horizontal (JSCCP–KAGGA) comparison uses the same constructs descriptively.

Methods

This is a qualitative, directed comparative document analysis (Okereke et al., 2025; Okoli, 2024). The primary corpus comprises the full text of the Jigawa State Climate Change Policy (January 2026), Nigeria's National Climate Change Policy 2021–2030, Nigeria's Third Nationally Determined Contribution in its September 2025 transmission version submitted to the UNFCCC, and the Climate Change Act, 2021, which supplies the legal and institutional structure both national instruments operate within. Each JSCCP provision invoking national alignment was extracted and cross-checked against the corresponding NCCP or NDC 3.0 provision across six analytical dimensions: institutional architecture, target specificity and quantification, sectoral coverage, financing mechanisms, monitoring/reporting/verification (MRV) provision, and gender and social-inclusion mainstreaming. Each dimension was then classified as fully aligned, partially aligned, or misaligned.

RESULTS AND DISCUSSION

Institutional architecture

JSCCP's institutional design closely mirrors the national model. The Climate Change Act, 2021 establishes the National Council on Climate Change under presidential chairmanship, supported by a Secretariat coordinating implementation across federal ministries, states, and other stakeholders (Federal Republic of Nigeria, 2021). JSCCP replicates this structure at state level: the Ministry of Environment and Climate Change is designated the lead agency and host of a Climate Change Policy Secretariat, implementation is guided by a multi-sectoral High-Level Steering Committee, and overall political authority rests with a State Climate Change Council chaired by the Executive Governor, working alongside an Inter-Ministerial Committee on Climate Change (Jigawa State Government, 2026, pp. 58, 66).

Mitigation and Energy Targets

The clearest misalignment concerns the energy sector. JSCCP states that “Nigeria's NDC (2021) commits to reaching 30% off-grid electricity from renewables and deploying 13 GW of off-grid solar capacity by 2030,” and sets Jigawa's own targets expanding off-grid solar, deploying clean cookstoves, and eliminating diesel generator use in public institutions by 2030 explicitly as a means of “localising the NDC” (Jigawa State Government, 2026, p. 33). These figures correspond to Nigeria's 2021 Updated NDC. They do not correspond to

Nigeria's current national position. NDC 3.0, transmitted to the UNFCCC four months before JSCCP's publication, sets a materially different target: 52% of generation capacity from renewable sources by 2035, a 50% renewable share in the generation mix and 100% electricity access by 2030 under the Mission 300 Compact, with a specified capacity mix of 10,400 MW hydro, 5,700 MW solar, 17,000 MW gas, and 2,500 MW demand-side management (NCCC, 2025, pp. 15–16). The 13 GW off-grid solar figure JSCCP treats as the current national benchmark does not appear in the NDC 3.0 text.

Adaptation and Agriculture

JSCCP's agriculture provisions are broad and directionally consistent with national priorities, but attach comparatively limited quantification. The policy commits Jigawa to expanding climate-smart agriculture and allocating 40% of CSA training slots to women, persons with disabilities, and youth (Jigawa State Government, 2026, pp. 30–31) a genuine instance of a quantified, checkable commitment. NDC 3.0's own agricultural adaptation measures are considerably more granular: a one-million-hectare increase in climate-resilient crop production, expansion of improved livestock breeds to 370,000 farmers, a 50% reduction in pre- and post-harvest food losses by 2030 rising to 90% by 2035, and System of Rice Intensification applied to 40% of irrigated rice, benchmarked against an 18-state rollout whose composition JSCCP does not confirm Jigawa's inclusion in (NCCC, 2025, pp. 27–28).

Climate Finance

JSCCP's financing chapter proposes a Jigawa State Climate Change Trust Fund, exploration of green and sustainability-linked bonds including Sukuk instruments, partnership with the Development Bank of Nigeria to access Green Climate Fund resources through Participating Financial Institutions, and a mechanism to channel Emissions Trading System proceeds into a state climate pipeline (Jigawa State Government, 2026, pp. 52–55). The state reports that its 2025 budget introduced climate budget tagging for the first time, identifying 115 climate-related initiatives across 14 sectors with combined capital allocations of ₦99.5 billion for mitigation and ₦252.68 billion for adaptation (Jigawa State Government, 2026, p. 52). JSCCP does not indicate what proportion of these figures represents new or additional climate finance rather than existing sectoral expenditure retrospectively classified as climate-related; this is treated here as a transparency gap in the source document rather than resolved by assumption. Set against NDC 3.0's own assessment of subnational financial readiness, the ambition appears substantially harder to deliver than the policy text alone implies: NDC 3.0 states that Nigeria requires US\$337 billion between 2026 and 2035 to implement the national contribution, roughly 80 %of which is expected from international sources that have historically channelled finance through national rather than subnational institutions, and it explicitly notes that Nigerian subnational entities face capacity challenges in accessing such funds (NCCC, 2025, pp. 7, 21–22).

Monitoring, Reporting and Verification

Both documents acknowledge the same underlying weakness. NDC 3.0 states that Nigeria's own Article 4 tracking system for mitigation progress “is still not fully functional” at the national level (NCCC, 2025, p. 7). JSCCP, in turn, commits Jigawa to “develop a subnational GHG inventory” rather than presenting one, and proposes a centralised data management

system at the Jigawa State Bureau of Statistics that is not yet operational (Jigawa State Government, 2026, pp. 28, 70). Both instruments recognise the need for MRV infrastructure, but neither currently possesses it, which means that, at the point of JSCCP's publication, no external mechanism exists to verify whether the policy's targets are subsequently met.

Comparison with Katsina State (based on Secondary Evidence)

Katsina and Jigawa share similar ecological, agricultural, and fiscal circumstances, which makes the divergence in their institutional choices analytically informative. Based on publicly available secondary reporting, Katsina's Governor unveiled KAGGA at a Katsina Climate Action and Green Investment Summit in April 2025, structured around four pillars climate-smart agriculture, renewable energy leadership, ecosystem restoration, and green industrialisation supported by a Katsina State Council on Climate Change and a dedicated Climate Change Secretariat housed within the Office of the Governor (Leadership, 2025a; AllAfrica, 2025). JSCCP's governance model, which channels authority through a State Climate Change Council and the Ministry of Environment and Climate Change, is structurally comparable but places implementation one administrative layer further from the Governor's direct office than the reported Katsina arrangement.

On financing, secondary reporting indicates Katsina's Governor pledged 30% of the state's annual budget to climate-resilient infrastructure and announced a ₦5 billion Green Investment Fund at launch, later reported as scaling toward a ₦50 billion afforestation and carbon-portfolio fund, alongside a US\$500 million renewable energy partnership covering solar mini-grids for government facilities (Leadership, 2025a; THISDAY, 2025; Voice of Nigeria, 2025). By comparison, JSCCP's ₦99.5 billion and ₦252.68 billion figures are larger in nominal terms but derive from budget tagging of existing sectoral allocations rather than a discrete, named fund (Jigawa State Government, 2026, p. 52). These are different fiscal instruments an earmarked vehicle against a mainstreaming exercise and this study does not find grounds, on the available evidence, to rank one as unambiguously superior; they differ chiefly in public legibility.

The clearest asymmetry concerns external validation. Katsina placed second among all 36 states in the SPP–Department of Climate Change 2025 Subnational Climate Governance Performance Rating (SPP, 2025; News Diary Online, 2025). Katsina officials publicly attributed a reported 30% rise in climate-related funding in 2025 to that ranking (News Diary Online, 2025); this study treats that as a reported attribution rather than an established causal finding, since alternative explanations including donor opportunities, federal programming, and independent budget cycles cannot be ruled out on the available evidence. Comprehensive, state-by-state results of the same ranking exercise for Jigawa were not accessible through the sources consulted here, which is itself notable: whatever Jigawa's position in the ranking, it has not been cited by the state's own government as informing the January 2026 policy.

Katsina also paired KAGGA with a reported public-facing digital platform, Katsina Climate Watch, intended to allow citizen tracking of climate projects, alongside visible participation at COP30 (AllAfrica, 2025). JSCCP's comparable provision, the planned centralised data system at the Jigawa State Bureau of Statistics, is designed for inter-agency coordination rather than public disclosure (Jigawa State Government, 2026, p. 70), which on the available

secondary evidence suggests a narrower public accountability mechanism than what has been reported for Katsina.

Table 1: Vertical Alignment of JSCCP with the National Climate Change Policy (2021–2030) and NDC 3.0

Dimension	JSCCP (2026)	NCCP 2021–2030	NDC 3.0 (2025)	Alignment classification
Institutional architecture	Ministry-led Secretariat; Governor-chaired Council; Inter-Ministerial Committee	NCCC-coordinated national framework	NCCC Secretariat, multilevel coordination mandate	Full alignment
Renewable energy / mitigation	13 GW off-grid solar; 30% off-grid renewables by 2030 (cites 2021 NDC)	General low-carbon transition goals	52% renewable generation share by 2035; 50% by 2030; 100% electricity access by 2030	Misalignment
Adaptation / agriculture	CSA expansion; 40% inclusion target in training slots	High-priority adaptation sector, general	1M ha resilient crops; 370,000 farmers; SRI for 40% irrigated rice; 18-state rollout	Partial alignment
Climate finance	Trust Fund; Sukuk/green bonds; DBN–GCF partnership; ₦99.5bn/₦252.68bn tagged budget	General resource-mobilisation provisions	US\$337bn needed 2026–2035; subnational capacity gap explicitly noted	Partial alignment
MRV	Planned subnational GHG inventory; planned centralised data system	National MRV framework referenced, not detailed at state level	Article 4 tracking “not fully functional” nationally	Partial alignment

Table 2: Horizontal Comparison of JSCCP and KAGGA (Katsina Evidence Based on Secondary Sources)

Dimension	Jigawa – JSCCP (primary text)	Katsina – KAGGA (secondary evidence)
Governance structure	State Climate Change Council (Governor-chaired) via Ministry of Environment and Climate Change	Reported: Council on Climate Change and Secretariat within the Office of the Governor
Financing mechanism	Budget tagging across 14 sectors; ₦99.5bn mitigation / ₦252.68bn adaptation (2025 budget)	Reported: dedicated ₦5bn–₦50bn Green Investment/afforestation fund; US\$500m energy partnership
Budget commitment	Not stated as a fixed percentage of annual budget	Reported: 30% of annual budget pledged to climate resilience
MRV / public monitoring	Planned internal data system (Jigawa State Bureau of Statistics)	Reported: public-facing “Katsina Climate Watch” platform
External validation	Ranking position not identified in sources consulted	Ranked 2nd nationally, 2025 SPP–DCC Subnational Climate Governance Performance Rating

Discussion

What Alignment Means in Practice

Read together, the results indicate that JSCCP's alignment with the national framework is uneven across dimensions rather than uniformly strong or weak. Institutional architecture, the dimension least dependent on numerical currency, is fully aligned. Adaptation, agriculture, finance, and MRV are partially aligned: JSCCP addresses the same substantive priorities as the national framework but without the quantification that would allow a reader to check state ambition against national benchmarks. Energy, the one dimension where JSCCP cites specific figures as evidence of alignment, is the dimension found to be misaligned, because those figures belong to a national commitment Nigeria had already revised by the time the state policy was published. This pattern suggests that JSCCP's claimed alignment is substantially structural: the state has adopted the vocabulary, sequencing, and institutional template of the national framework but only partially substantive at the level of measurable commitment.

Why Ambition Exceeds Documented Capacity

The gap between financing ambition and institutional readiness observed in JSCCP is not unique to Jigawa; NDC 3.0 identifies the same constraint for Nigerian subnational

governments generally (NCCC, 2025, p. 7). This is consistent with the broader literature on Nigerian subnational climate governance, which finds that the small number of states with climate policies tend to produce broad sectoral coverage without corresponding quantification or verification capacity (Okereke et al., 2025). Read alongside Okoli's (2024) comparative assessment of Nigerian and Kenyan climate governance regimes, this suggests a structural pattern in Nigeria's multilevel climate architecture: national instruments are becoming more specific and quantified over successive NDC cycles, while subnational instruments, understandably given more limited technical and fiduciary capacity, continue to rely on broader, less time-bound commitments.

Lessons from the Katsina Comparison

The Katsina evidence, treated throughout as secondary and not directly verified against a primary policy text, nonetheless points to a specific and testable proposition: that externally validated, comparative governance ranking can function as a visible accountability mechanism in a way that internal budget tagging alone does not. This is consistent with the general case Okereke et al. (2025) make for performance-based disclosure in Nigerian subnational climate governance, and it is consistent with what Katsina officials have themselves publicly claimed. It is not, on the evidence

available to this study, an established causal finding, and should be treated as a hypothesis worth testing directly against Jigawa's own position in the same ranking exercise, which was not accessible for this review.

Implications for Desertification-affected Local Government Areas

The partial alignment identified in JSCCP's adaptation and land-use provisions has a specific downstream consequence for Jigawa's most desertification-exposed LGAs. The policy commits to restoring 3,000 hectares of degraded woodland "in high-erosion or desert-prone LGAs" by 2030 and to developing a land-use classification and forest zoning map by 2026 (Jigawa State Government, 2026, p. 32), and identifies "13 high-risk LGAs" for flooding without naming them in the policy text (Jigawa State Government, 2026, p. 20). Neither provision specifies whether LGAs such as Babura, Maigatari, and Birniwa with documented desertification pressure are prioritised within these commitments. This is precisely the kind of spatial and evidentiary gap that LGA-level vulnerability assessment is positioned to address, and it indicates a concrete, non-rhetorical use for empirical adaptation research within the policy's own stated priorities.

CONCLUSION

This study finds that the Jigawa State Climate Change Policy is institutionally well aligned with Nigeria's national climate governance model but only partially aligned, and in one measurable respect misaligned, with the substantive targets of the National Climate Change Policy and NDC 3.0. Its renewable energy commitments reproduce a superseded national benchmark; its adaptation, agriculture, and finance provisions address the right priorities without matching the quantification the current national framework provides; and its MRV infrastructure, like the national government's own, remains a stated intention rather than an operating system. Compared with Katsina, evaluated here on the basis of secondary evidence, Jigawa's institutional model is broadly comparable in ambition but currently offers less public visibility, a less centralised financing vehicle, and no confirmed position in the external governance ranking that Katsina has used to its evident advantage.

Three recommendations follow. First, the Ministry of Environment and Climate Change should formally reconcile JSCCP's sectoral targets, beginning with energy, against the figures now in force under NDC 3.0, since a stated alignment claim that is already outdated at publication undermines the coordinating function multilevel climate governance depends on. Second, the state should prioritise the subnational greenhouse gas inventory and MRV platform the policy already commits to, structured minimally around a baseline, an indicator, a quantified target, a responsible institution, a reporting frequency, a verification mechanism, and a public disclosure channel; without this, the policy's stated targets, including those found here to be well-aligned, cannot be independently verified. Third, given the reported association between external governance rating and increased climate financing in Katsina, Jigawa should treat its own position in the Subnational Climate Governance Performance Rating, and future iterations of it, as an accountability instrument in its own right rather than a passive scorecard, and should publish that position regardless of outcome.

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