

REGULATORY INSIGHTS: NIS LAUNCHES NEW ONLINE CERPAC PLATFORM

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INTRODUCTION

The Nigerian Immigration Service ('NIS') recently announced the launch of a new digital platform for the application and processing of the Combined Expatriate Residence Permit and Aliens Card ('CERPAC'), marking a significant shift in Nigeria's immigration system.¹ The digital platform, officially launched on 1st August 2025, now requires all CERPAC applications to be submitted online via the e-CERPAC platform.² Accordingly, beginning from 1st August 2025, the use of physical CERPAC forms will be discontinued and no longer accepted as all applications for CERPAC would be required to be made through the online platform.

WHAT IS CERPAC?

The Combined Expatriate Residence Permit and Aliens Card (CERPAC) is a government-issued immigration document that serves as both a residence permit and means of identification for foreign nationals in Nigeria. The essence of a CERPAC is to allow foreigners to reside and engage legally in employment or business activities in Nigeria for an extended period, not exceeding two (2) years, subject to renewal. Thus, any foreigner who intends to stay in Nigeria for more than three (3) months for paid employment, business, or residency purposes is required to obtain a CERPAC.³

For corporate employers, CERPAC represents a fundamental compliance requirement when engaging expatriate staff. Under the Immigration Act 2015 (*the Act*), any corporate employer in Nigeria who is desirous of employing an expatriate, is required, unless exempted under the Act, to apply to the Comptroller-General of Immigration ('CGI'). The applicant must provide such information required by the CGI for the repatriation of the expatriate and his dependents. No expatriate may be employed without the permission of the CGI.⁴ Accordingly, corporate employers in Nigeria have the responsibility to ensure that all their foreign employees are lawfully permitted to reside and work in Nigeria, as failure to obtain the requisite authorisation from the CGI may expose them to regulatory sanctions from the NIS.



1 Nigeria Immigration Service, 'NIS Sets August 1st To Roll Out Fully Digital CERPAC Application Process'

<<https://immigration.gov.ng/press-release-nis-sets-august-1st-to-roll-out-fully-digital-cerpac-application-process/>> accessed 30th July 2025.

2 Nigeria Immigration Service, 'E-CERPAC' <<https://cerpac.immigration.gov.ng>> accessed 30th July 2025.

3 Section 37 (2) and (9), Immigration Act 2015.

4 Section 38 (1), Immigration Act 2015.

KEY FEATURES OF THE ONLINE PLATFORM

The new online CERPAC platform offers a centralized, end-to-end system for making applications for expatriate residence permits. Some of the distinct features of the platform are briefly described below:

a. Digital Application Submission: Applicants and employers can complete and submit CERPAC forms entirely online without visiting an immigration office. This saves time, reduces paperwork and eliminates the need for physical interaction.

b. Document Upload Portal: All documents required for processing the application e.g. passport data page, expatriate quota approval, employment letter, etc., can be uploaded in digital format. This ensures secured and centralised storage of application materials for easier verification.

c. Integrated Payment System: The platform provides a secure online payment gateway for all applicable fees, thus, improving financial transparency.

d. Application Tracking Dashboard: Users can monitor the real-time status of applications through a personalised dashboard. This enhances visibility and reduces uncertainty around processing times and decision stages.

e. Renewal and Expiry Notifications: Automated alerts for permit renewal timelines are integrated to keep applicants and employers informed.

f. Feedback and Query Resolution Interface: The portal allows users to submit inquiries and receive responses directly from NIS, aimed at promoting better user experience and efficient resolution of complaints without the need for in-person visits.

g. User Verification and Login Security: Strong Identification verification and login security protocols are put in place to protect sensitive data, maintain data confidentiality and restricts unauthorized access.



LEGAL AND REGULATORY FRAMEWORK

The application, processing and issuance of CERPAC is governed by the Act and administered by the Nigeria Immigration Service under the Federal Ministry of Interior. While the CERPAC application process has now been digitised, all existing legal obligations applicable to employers and expatriate employees remain in full force.

Pursuant to section 36 (1) of the Act, a foreign national seeking to accept employment in Nigeria, must first obtain the written consent of the CGI, except it is a Federal, State, or Local Government employment. The section further provides that a foreign national seeking to practice a profession, establish or take over any trade or business, or register or takeover a limited liability company in Nigeria, either alone or in partnership with another, must obtain the written consent of the Minister of Interior.⁵ Failure to comply with this provision would be deemed an offence with the offender liable on conviction to a fine of N1,000,000.00 or deportation, or both, as a prohibited immigrant.⁶

Section 37 (3) of the Act stipulates that a foreign national desirous of entering Nigeria for the purpose of residence shall, unless exempted under the Act, show evidence of immigration responsibility or any other security on his behalf. He shall also supply such information as the Comptroller General of Immigration (CGI) may require. Upon satisfaction of these requirements, the CGI may issue a residence permit i.e. CERPAC. Section 37 (5) of the Act empowers the CGI to endorse conditions on the residence permit, provided such conditions are not inconsistent with the Act, and to replace any valid permit issued or deemed issued.



⁵ Section 36 (1) (b), Immigration Act 2015

⁶ Section 36 (2), Immigration Act 2015

A residence permit is valid for a period not exceeding two (2) years and is subject to renewal.⁷

Section 38 (1) of the Act provides that a person desirous of employing a foreign national shall, unless exempted under the Act, apply to the CGI in the manner prescribed and shall give such information as may be required by the CGI for the repatriation of the foreign national and his dependents, and no such foreign national shall be employed without the permission of the CGI.

In view of the foregoing provisions, it is clear that the Act imposes separate and concurrent statutory obligations on the foreign national and the corporate employer. A foreign national is prohibited from residing, accepting employment, or establishing a business in Nigeria without first obtaining written consent prescribed under the Act. Likewise, a corporate employer is obligated to seek approval from the CGI before employing such foreign national, and ensure full compliance with immigration and repatriation requirements.

COMPLIANCE CONSIDERATIONS FOR EMPLOYERS

With the launch of the CERPAC online application portal, employers must transition to the use of the digitised system to ensure they satisfy their compliance obligations. The immediate obligations for employers include:

- a.** Submitting all pending physical application forms by 31st July 2025 or risk forfeiting their application status.
- b.** Training their Human Resources, Legal Departments and relevant personnel on the use of the digital portal.
- c.** Adapting internal documentation and submission processes to ensure alignment with the new online application requirements.
- d.** Monitoring expiry and renewal timelines especially for expatriate CERPAC holders who are approaching renewal dates.

Failure to comply with the new CERPAC requirements may expose employers to significant legal and operational risks. While the expatriate employees working with no valid CERPAC documentation stand the risk of being deported,⁸ the employers on the other hand may incur penalties such as imprisonment terms and/or fines,⁹ reputational damages as well as a drain in talent acquisition.

⁷ Section 37 (2), Immigration Act 2015

⁸ Section 37 (7), Immigration Act 2015.

CONCLUSION

The digitisation of CERPAC applications represents both an opportunity and a challenge for employers. While the new system would facilitate improvement in efficiency and transparency, the transition requires careful management to maintain compliance and avoid disruption to business operations. Corporate employers must take prompt steps to ensure continued compliance and avoid disruption to their expatriate workforce. The recommended steps are:

- a.** Conducting a comprehensive review of all current expatriate employees to identify CERPAC status, renewal dates, and any pending applications under the previous system yet to be completed.
- b.** Updating internal procedures to reflect the new digital requirements and train relevant departments and personnel on how to interface with the digital platform.
- c.** Engaging qualified legal and regulatory compliance practitioners to support a seamless transition to the e-CERPAC platform and provide tailored guidance to teams and personnel involved in expatriate administration.

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LEGAL PRACTITIONERS



⁹ Section 38 (5) of the Immigration Act 2015.

Babalakin & Co. is a firm with broad experience on the subject of Regulatory Compliance and all matters related to it. If you have any questions or would like information on the issues discussed, please contact:



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