

January 21, 2026

Dr. John Asein
The Director-General
Nigerian Copyright Commission (NCC)
Federal Secretariat Complex, Abuja

Dear Director-General,

Re: Inquiry on the Levy on Copyright Materials and Inclusion of ReLPI Members in the Distribution Framework

We write on behalf of the member record companies of the Record Label Proprietors' Initiative Ltd/Gte (ReLPI), further to our earlier correspondence and engagements with the Commission on the subject of the Levy on Copyright Materials and the inclusion of owners of sound recordings in the distribution framework, and respectfully refer to the following:

1. ReLPI's letter dated 12 December 2024
2. NCC's response dated 14 February 2025
3. ReLPI's further letter dated 26 May 2025

In previous correspondence with your office, the Nigerian recorded music industry, through ReLPI, expressed the need to ensure that the Levy on Copyright Material Order serves the interests of the respective right holders and aligns with standard practice, including in the establishment of the shares among the relevant classes of rights and in the distribution of the levies.

ReLPI members commend the efforts of the Commission in ensuring that the copyright levy scheme becomes a practical reality, rather than merely a paper regulation. We acknowledge the work being done by the NCC to activate the levy framework and to strengthen copyright administration in Nigeria.

However, ReLPI's attention has been drawn to the imminent disbursement of the copyright levy, despite the fundamental issues raised by our member record companies remaining unresolved.

We have also been informed that the portion of the levy dedicated to the music industry is proposed to be paid through a collective management structure. ReLPI members wish to clearly state that they are not opposed to any portion of the levy allocated to the music industry being paid through any collective management organisation duly recognised by the Commission.

However, with respect to sound recordings as a distinct category of copyright under the Copyright Act, and the portion of the levy attributable to sound recordings owned and controlled by our record company members, our members maintain that:

- No collective management organisation currently represents their sound recording interests in Nigeria;
- Funds attributable to sound recordings should not be routed through any CMO that does not have the mandates of our members;
- The portion of the levy relating to sound recordings should be paid through ReLPI, as the industry body expressly mandated by its member record companies to represent and protect their interests; and
- The implementation of the Copyright Levy Order should be in line with the Nigerian Law, including the opt-out provisions in the Act [(s88(9)(d)] of the Copyright Act 2022

It is our members' position that the operational conduct of certain CMOs has not inspired the level of trust and confidence required for them to serve as custodians of funds belonging to record companies, largely due to governance and operational deficits and deficiencies that have not been substantively addressed over the years. Our members are therefore concerned that routing sound recording funds through third-party structures would undermine transparency, accountability, and investor confidence.

Record companies are the primary investors in Nigeria's recorded music industry. Our members bear the heavy financial burden of discovering talent, funding production, marketing, distribution, promotion, international export, and long-term catalogue development. These investments drive Nigeria's cultural economy, create employment across the creative value chain, enhance Nigeria's global cultural presence, and generate significant economic value for the nation.

It is therefore our respectful submission that excluding owners of sound recordings from the levy distribution framework, or routing their entitlement through structures that do not represent them or command their respect, would be unjust, inequitable and inconsistent with the intent of the Copyright Act.

In the interest of justice, equity, transparency, and accountability, our members respectfully request an urgent meeting with the Commission at the earliest possible opportunity to resolve these outstanding issues. We are confident that constructive engagement will lead to a framework that is fair, inclusive, and sustainable for all stakeholders. We must allow a situation where these fundamental principles are sacrificed at the altar of convenience. We would be grateful to receive the Commission's response within seventy-two (72) hours of receipt of this letter, given the time-sensitive nature of the impending levy disbursement.

Our members are fully prepared and committed to defend their statutory rights to equitable participation in the levy scheme and will not be compelled to accept any arrangement that does not protect the legitimate interests of their artistes, creators, and investors.

We look forward to a speedy resolution of these concerns and to the Commission honouring our request for urgent engagement on this matter.

Please accept the assurances of our highest regard.

Yours faithfully,



Tega Oghenejobo

Chairman

cc:

1. Hon. AGF & Minister of Justice
2. Hon. Minister of Arts, Culture, Tourism, and Creative Economy
3. Hon. Minister of Finance & Coordinating Economy
4. Hon. Solicitor General of the Federation