



ISSUE BRIEF

March, 2026

Title:

Arbitrary Increases in Domestic Flight Fares: Need for Legislative Oversight to Safeguard Competition and Consumer Protection

Authors:

Dr. Etimbuk Obot, Dr. Martins Udom & Livinus Nandi

Department of Democracy and Governance

Institute for Legislative and Democratic Studies (NILDS)

Executive Summary

On 27 February 2026, the Federal Competition and Consumer Protection Commission (FCCPC) released an interim report following its review of domestic airline pricing during the December 2025 festive peak and the post-peak period of January 2026. The Commission's preliminary findings indicate that fares during the festive window were materially higher across multiple routes despite relative stability in key operating variables such as aviation fuel prices, government-imposed taxes, and foreign exchange rates. According to the FCCPC, the observed differences were not attributable to regulatory fee adjustments but instead reflected airline pricing decisions, including yield management practices and capacity allocation strategies.

The interim report identified significant fare disparities on certain high-density routes. On the Abuja–Port Harcourt route, for example, peak fares reportedly differed from post-peak fares by as much as ₦405,000 for a single ticket. Median fares across sampled routes increased markedly during the festive period compared to January benchmarks. The Commission referenced the possible applicability of Sections 59, 72, 107, 108, 124, and 127 of the Federal Competition and Consumer Protection Act (FCCPA) 2018, which address anti-competitive agreements, abuse of dominant position, price fixing, conspiracy, unfair contract terms, and consumer protection principles. While the findings remain interim and further investigation is ongoing, the magnitude and pattern of the fare increases raise broader concerns regarding pricing transparency, competitive conduct, and consumer welfare within Nigeria's aviation market.

Although seasonal demand fluctuations are common in aviation markets globally, the interim findings suggest that significant fare increases occurred during predictable peak periods without corresponding shifts in major cost drivers. The clustering of peak fares within narrow ranges on certain routes, combined with substantial post-peak differentials, warrants careful legislative scrutiny to determine whether such pricing patterns reflect legitimate commercial strategy or potentially fall within the scope of anti-competitive or exploitative conduct as contemplated under the FCCPA 2018. The issue therefore extends beyond short-term fare movements to broader



structural questions concerning market concentration, regulatory safeguards, and consumer protection in concentrated-route markets.

The National Assembly has constitutional oversight responsibility over regulatory agencies and statutory frameworks governing competition, aviation, and consumer protection. While the FCCPC is empowered to investigate and enforce under the FCCPA 2018, legislative engagement is essential to ensure accountability, assess whether legislative gaps exist, and determine whether additional safeguards are required during predictable seasonal demand surges. Effective oversight will also strengthen coordination between the FCCPC, the Nigerian Civil Aviation Authority (NCAA), and other relevant institutions.

In light of the foregoing, the House Committee on Aviation and the House Committee on Commerce (Competition and Consumer Protection) are respectfully urged to consider the following actions:

1. Jointly invite the FCCPC, the NCAA, and representatives of domestic airlines to present detailed findings on festive pricing patterns, cost structures, and route-level data.
2. Formally request submission of the FCCPC's final investigative report upon conclusion, including methodology, data sources, and legal analysis under the FCCPA 2018, to enable informed legislative review.
3. Engage the FCCPC and the NCAA to determine whether existing provisions of the FCCPA 2018 adequately address excessive pricing during predictable demand spikes or whether legislative clarification or amendment is required to strengthen enforcement tools in sectors characterised by limited-route competition.
4. Through oversight hearings, assess whether route-level market concentration, slot allocation practices, or other structural factors may inadvertently limit competition during peak seasons.
5. In light of the FCCPC's indication that foreign airlines will also be reviewed, request comparative route analysis to determine whether Nigerian consumers face disproportionate pricing relative to comparable regional markets.

Background

On 27 February 2026, the Federal Competition and Consumer Protection Commission (FCCPC) released an interim report following a review of domestic airline pricing during the December 2025 festive period and the post-peak period of January 2026¹.

¹ Franca Ochigbo, F. (2026, February 27). Airlines to face FCCPC sanctions for arbitrary pricing. *The Nation*. <https://thenationonline.ng/airlines-to-face-fccpc-sanctions-for-arbitrary-pricing/>



According to the Commission, preliminary findings indicate that fares during the December peak were materially higher than those recorded in January across several routes, despite relative stability in key operating variables such as fuel prices, government taxes, and foreign exchange rates. The FCCPC stated that the observed fare differences did not appear to be linked to regulatory fee changes but instead reflected airline pricing decisions, including yield management and capacity allocation².

The interim report further noted that on certain high-density routes, such as Abuja–Port Harcourt, fare differences between peak and post-peak periods reached approximately ₦405,000 for a single ticket. Median fares across sampled routes rose markedly during the festive window compared to post-peak benchmarks.

The Commission has referenced the potential relevance of Sections 59, 72, 107, 108, 124, and 127 of the Federal Competition and Consumer Protection Act (FCCPA) 2018, which address anti-competitive agreements, abuse of dominant position, price fixing, conspiracy, unfair contract terms, and consumer protection principles.

While the FCCPC has emphasised that this is an interim report and that further analysis is ongoing, the issue raises broader questions about pricing transparency, competitive conduct, and consumer protection in Nigeria’s aviation market that require urgent legislative oversight.

Issue:

The interim findings suggest that significant fare increases occurred during predictable peak demand periods without corresponding changes in major cost drivers. While seasonal demand fluctuations are common in aviation markets globally, concerns arise where pricing behaviour may potentially fall within the scope of anti-competitive conduct or unfair market practices as defined under the FCCPA 2018.

The clustering of peak fares within narrow ranges across operators on certain routes, combined with substantial differences between festive and post-peak pricing, warrants careful legislative scrutiny to determine:

- Whether pricing patterns reflect legitimate commercial yield management;
- Whether market concentration on certain routes may enable coordinated behaviour;
- Whether consumers are adequately protected from excessive or exploitative pricing; and
- Whether existing regulatory frameworks provide sufficient safeguards during predictable peak periods.

Although the FCCPC has initiated an investigation, legislative oversight remains essential to ensure transparency, accountability, and long-term structural safeguards within the sector.

Rationale for National Assembly Action:

² ibid



The National Assembly has oversight responsibility over regulatory agencies and statutory frameworks governing competition, aviation, and consumer protection. While the FCCPC is empowered to investigate and enforce under the FCCPA 2018, legislative oversight serves several important functions:

1. Ensuring that investigations are thorough, impartial, and evidence-based;
2. Determining whether legislative gaps exist in regulating pricing transparency in the aviation sector;
3. Examining whether additional safeguards are required during predictable seasonal demand surges;
4. Reviewing the effectiveness of coordination between the FCCPC, the Nigerian Civil Aviation Authority (NCAA), and other relevant bodies.

Air travel plays a critical role in economic integration, business mobility, and national cohesion. Sustained concerns about pricing fairness, if unresolved, may undermine consumer confidence and market stability.

Recommendations to the National Assembly

To address this issue, the House Committee on Aviation and the House Committee on Commerce (Competition and Consumer Protection) are respectfully urged to do the following:

1. Jointly invite the FCCPC, NCAA, and representatives of domestic airlines to present detailed findings on festive pricing patterns, cost structures, and route-level data.
2. Formally request submission of the final investigative report once concluded, including methodology, data sources, and legal analysis under the FCCPA 2018, to the National Assembly.
3. Engage the FCCPC and NCAA on the Federal Competition and Consumer Protection Act (2018) to determine whether existing provisions adequately address excessive pricing during predictable demand spikes or whether clarifications are required to strengthen enforcement tools in sectors with limited route competition.
4. Through oversight, assess whether route-level concentration or slot allocation practices may inadvertently limit competition during peak seasons.
5. In light of the FCCPC's announcement that foreign airlines will also be reviewed, the National Assembly may request comparative route analysis to determine whether Nigerians face disproportionate pricing relative to comparable regional markets.

Conclusion

The FCCPC's interim findings raise important questions about airline pricing conduct during predictable peak travel periods. While seasonal demand can legitimately influence fares, the



magnitude of the increases observed, combined with apparent stability in major operating variables, justifies continued regulatory scrutiny.

Legislative oversight at this stage is not intended to pre-empt regulatory conclusions but rather to ensure transparency, reinforce consumer protection principles, and determine whether Nigeria's legal framework adequately addresses pricing behaviour in concentrated markets. Proactive engagement by the National Assembly will help safeguard competitive market outcomes while preserving the operational viability of the aviation sector.

.

Contact

National Institute for Legislative and
Democratic Studies
National Assembly
Plot 307 Cadastral Zone
Umaru Musa Yar'adua Expressway, Airport
Road

Abuja Nigeria

E-mail: info@nils.gov.ng

Website: <http://nils.gov.ng>

NILDS Liaison Office

Suite 214 Senate Wing
National Assembly Complex
Mobile: +234 806 694 5075