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AN APPRAISAL OF THE REQUIREMENTS FOR THE ADMISSIBILITY OF EXPERT EVIDENCE IN NIGERIA

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Abstract

This study examines the requirements guiding the admissibility of expert evidence under Nigerian law. Using doctrinal research methodology, it examines the provisions of the Evidence Act 2011, which establishes the criteria for expert qualification, including professional competence, relevant experience, and specialized knowledge in technical fields. It discusses some basic terms as well as concepts that relates to the Law of Evidence. In essence, an appreciation of the true meaning and import of such concepts and terms, is sine quanon to a proper understanding of the requirements guiding the admissibility of expert evidence under Nigerian law. The study identifies challenges in the current system, including conflicting expert opinions, lack of a clear regulatory framework, Bias and partisanship, lack of trust by courts and procedural delays and costs. It concludes by recommending reforms to strengthen credibility, standardize qualifications, and enhance the reliability of expert testimony in Nigerian courts.

Keywords: Admissibility, Relevance, Witnesses, Expert, Evidence, Skilled, Nigeria, Courts, Law

1. Introduction

The admissibility of expert evidence in Nigerian courts represents a critical juncture between legal proceedings and specialized knowledge, fundamentally shaping the quality of judicial decision-making in complex cases. Unlike ordinary witnesses, whose duty is to testify on facts within their personal knowledge, expert witnesses are permitted to provide opinions to aid the court in understanding complex matters outside its ordinary competence.[1] The admissibility of expert witnesses, however, is not automatic; it is subject to strict legal requirements to ensure relevance, reliability, and impartiality. Nigerian courts have consistently emphasized that expert witnesses must assist the court rather than usurp the decision-making role of the judge.[2]

2.

Despite these provisions, challenges such as conflicting expert opinions, lack of a clear regulatory framework, Bias and partisanship, lack of trust by courts and procedural delays and costs. This paper appraises these admissibility requirements, identifying gaps and suggesting reforms for more effective application.

3. Definition of Basic Terms

A. Trial

The basic duty of courts in Nigeria is spelt out in section 6 sub-section (6) (b) of the 1999 Constitution of the Federal Republic of Nigeria (as amended). The power of the judiciary extends to all matters between persons, or between government or authority and to any persons in Nigeria and to all actions and proceedings relating thereto; for the determination of any question as to the civil rights and obligations of that person.[3] Jowitt's Dictionary of English Law defines the term "trial" as **"**……*finding out by due examination the truth of the point in issue or question between the parties, whereupon judgment may be given*."[4]

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[1] Evidence Act 2011, s.68

[2] *Odu'a Investment Co. Ltd v Talabi* [1997] 10 NWLR (Pt.523) 1).

[3] See section 6 of the Constitution of the Federal Republic of Nigeria 1999 (as amended)

[4] Quoted from: *Jimoh v. The State* (2014) LPELR 22464 (SC) P. 30

The above definition clearly distinguishes the process of trial from the investigation process conducted by the police or other security outfits. As Bate, J., noted in the case of *Duriminiya v Commissioner of Police*[5] that:

> *……a trial is not an investigation, and investigation is not the function of the court. A trial is the public demonstration and testing before the court of the cases of the contending parties. The demonstration is by an assertion and evidence, and the testing is by cross-examination and argument. The function of a court is to decide between the parties on the basis of what has been so demonstrated.*[6]

The purpose of a trial court is essentially to establish the justice of a case based primarily on the weight and substantiality of proved facts.[7] The task of trying a case by a court of law does not require the court making enquiries into the case outside of the court, of a matter not demonstrated openly before it. Thus during trials, parties are required to establish by evidence, either by oral, documentary or electronic; those facts upon which their cases rest or depend upon.[8]

B. Evidence

The word "evidence" can be defined in many ways, depending on the context in which it is used. In relation to trial, it simply refers to the piece of information that is put before a court in order to prove or disprove a fact in issue.[9] Black's Law Dictionary defines evidence as: *"[s]omething (including testimony, documents and tangible objects) that tends to prove or disprove the existence of an alleged fact."*[10]

The writ of summons and the parties' pleadings do not constitute evidence. Evidence must be led to prove facts pleaded, although facts admitted need no further proof.[11] Phipson on Evidence[12]defines "evidence" as "…*the testimony, whether oral, documentary or real which may be legally received in order to prove or disprove some facts in dispute*"[13]

Flowing from Phipson's definition, what constitutes evidence is that which "may be legally received" in a trial to prove or disprove a fact. The Supreme Court in *Tukur v UBA & Ors*[14]elaborately defines evidence as:

> *…the demonstration of a fact; it signifies that which demonstrates makes clear, ascertains the truth of the very fact or point in issue, either on the one side or on the other. In legal acceptation, the term 'evidence' includes all the means by which any alleged matter of fact, the truth of which is submitted to investigation, is established or disproved*.

Arguments of counsel in their oral or written submissions are never referred to as evidence as decided in *Archibong v Edak*[15] that addresses or submissions of counsel, no matter how brilliant, can never take the place of evidence. Furthermore, questions put to witnesses by counsel do not qualify as evidence. Only the answers are evidence.

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[5](1961) NNLR 70 at P. 73
[6]ibid see n4 at P.73
[7]*C & C Construction Ltd v Okhai* (2003) 12SCM 65
[8]*Obasi & Anor. v. Onwuka & Ors* (1987) 7 SC (Pt. 11) 233
[9]See *Owe v Oshinbajo* (1965) 1 ANLR 72
[10]B A Garner, (Ed.), *Black's Law Dictionary*, (Thomson Reuters, 2009) p635.
[11]*Khalil v Yar'adua* (2003) 16 NWLR (Pt 847) 466; *Ngige v Obi* (2006) 14 NWLR (Pt. 999) 122
[12]M N Howard, and others (Eds.) *Phipson on Evidence* (15th edn, London Sweet & Maxwell, 2000) p 2
[13]Ibid.
[14](2012) LPELR- 9337 (SC)
[15](2006) 7 NWLR (Pt. 980) 485

In a criminal trial, it [evidence] consists of facts which the prosecution must establish in order to prove its case and the accused must establish to raise a defense. In civil matters, it entails what the parties put forward to ascertain their pleadings before the court; and this excludes inferences and arguments.[16]

Also, in *Saidu v The State*[17], the Supreme Court held that the first step to prove a confession is to properly tender it in evidence as a confession, and not for identification purpose only, which is of no value.

C. Facts

Black's Law Dictionary defines "fact" to be a thing done; an action performed or an incident transpiring; an event or circumstance; an actual occurrence; an actual happening in time or space or an event mental or physical; that which has taken place.[18] The Evidence Act [19]defines facts to include:

- **a.** Anything, state of things, or relation of things capable of being perceived by the senses; and
- **b.** Any mental condition of which any person is conscious.

A fact is said to be "proved" when, after considering the matters before it, the court either believes it to exist or considers its existence so probable that a prudent man ought in the circumstances of the particular case to act upon the supposition that it does exist.[20] On the other hand, a fact is said to be "disproved" when, after considering the matters before it, the court either believes, that it does not exist or considers its non-existence so probable that a prudent man ought, in the circumstances of the particular case, to act upon the supposition that it does not exist.[21]

Furthermore, facts not proved as stipulated under section 121 sub-section (c), Evidence Act 2011 are not facts that are proved nor disproved. What facts must be proved? These are facts that are material to the sustenance of a case. They are the material facts which, if not established, will make the party who ought to depend on it fail. The only exceptions to these material facts are facts which are already admitted in evidence as stated under section 123 of the Evidence Act 2011 and facts which the court must take judicial notice of as provided for under Section 122 (1), (2), (3), and (4). Going forward facts that are to be judicially noticed include but not limited to the following:

i. All laws or enactments and any subsidiary legislation made under them having the force of law now or previously in force in any part of Nigeria;
ii. All public Acts or Laws passed or to be passed by the National Assembly or a State House of Assembly, as the case may be, and all subsidiary legislation made under them and all local and personal Acts or Laws directed by the National Assembly or a State House of Assembly to be judicially noticed;
iii. The course of proceeding of the National Assembly and of the House of Assembly of the States of Nigeria;
iv. The assumption of office of the President, a State Governor, or Chairman of a Local Government Council, and of any seal used by any such public officer.

D. Facts in Issue

The Supreme Court in the case of *Olufosoye v Olorunfemi*[22]held that an admitted fact is not in issue. It is only when facts are in dispute that they are said to be in issue. Admitted facts cannot be in

[16]T A Aguda, *Law and Practice Relating to Evidence in Nigeria* (MIJ Professional Publishers Ltd, 1998)
[17](1982) 4 S.C. (Reprint) 26
[18]B A Garner, (Ed.), *Black's Law Dictionary*, (Thomson Reuters, 2009).
[19]Section 258 (1)
[20]Section 121 (a) Evidence Act, 2011
[21]Section 121 (b) ibid.
[22](1989) 1 NWLR (PT. 95) P. 26

issue.[23] So if the facts are not being contended, it will not qualify as facts in issue. It is a point that has arisen in the pleadings of the parties in civil cases which form the basis of the dispute or litigation and therefore requires resolution by a trial court.[24] When crime is alleged in civil proceedings, the commission of that crime becomes a fact in issue and must be proved beyond reasonable doubt.[25] In criminal proceedings, the ingredients required to prove an offence can bring about fact in issue.

E. Expert Witness

There is no provision that the special skill attributable to an expert must be acquired through formal education; professionally or otherwise. It is enough that the person claiming to be an expert has the skill that he professes or asserts to have. The Supreme Court in the Locus Classicus of *Seismograph Series Ltd v Onokpassa,*[26]emphatically held that in determining who an expert witness is, the posers set out below will be answered in the affirmative to wit:

(i) Is he peritus?
(ii) Is he skilled?
(iii) Has he an adequate knowledge?

Section 68 (1) of the Evidence Act provides thus:

> *68(1)When the Court has to form an opinion upon a point of foreign law, native law or custom, or of science or art, as to identity of handwriting or finger impressions, the opinions upon that point of persons specially skilled in such foreign law, customary law or custom, or science or art, or in questions as to identity of hand writing or finger impressions, are admissible.*
> *(2) Persons so specially skilled as mentioned in subsection (1) are called experts***.**

3. Scope of Expert Evidence

Expert on Handwriting

In accordance with sections 68 and 72 of the Evidence Act 2011, both an expert and a non-expert, including a judge can form an opinion on the handwriting of a person. However, the opinion of a person who has special skills in handwriting or finger impression is relevant and admissible when relevant to the fact in issue.[27]Furthermore, the signature of a person may be proved by persons that are acquainted with it; they may have seen the party write, received communication from him; or observed communication from the party in the course of business.[28]

Expert on Foreign Law

An expert in foreign law does not necessarily mean the expert needs to be qualified to practice in a foreign country. His opinion is relevant and admissible if his experience or training qualifies him to be an expert; especially where the person is sufficiently skilled in foreign law. Such expert opinion is relevant to a fact in issue when the court is to form an opinion on several technical matters relating to foreign law.[29]

Expert on Customary Law and Custom

Prior to taking judicial notice of a custom, it must have been established in several cases by litigants and affirmed by the court, as to acquire notoriety.[30] Also opinion of native chiefs as well as any

[23]*Elimare v Ehonyo* (1985) 1 NWLR (Pt. 2) 177, Section 123 Evidence Act, 2011
[24]See also *Onafowokan & ors v Wema Bank Plc& Ors*. (2011) LPELR 2665 (SC)
[25]*Koiki v Magnusson* (2001) FWLR (Pt. 63) 167 (S.C)
[26](1972) ANLR (Reprint) 347, 357-359
[27]See *Ize-Iyamu v Alonge* (2007) All FWLR (Pt. 371) 1570 C.A
[28]S. 61 (1) and (2); UTB v. Awanzigana Enterprises (1994) 6 NWLR (Pt. 348) 56
[29]*Said Ajani v Comptroller of Customs*, (1952) 14 WACA 34
[30]See *Giwa v Erimilokun* (1961) All NLR 294 at 296

person having special knowledge of the custom may be relevant and admissible as expert testimony. Additionally, books or manuscripts recognized by natives as a legal authority are relevant.[31].

4. Requirements for Admissibility of Expert Evidence in Nigeria

The admissibility of expert evidence in Nigeria is not automatic; it is subject to certain well-established requirements under both the Evidence Act 2011 and judicial precedents. These requirements prevent expert testimony from being abused and protect the court from speculative or biased opinions. The key requirements are discussed below.

A. Relevance

For expert evidence to be admissible, it must be relevant to the issues in dispute before the court. Section 1 of the Evidence Act 2011 provides that evidence is admissible only if it is relevant. Specifically, Section 68 allows expert opinions on matters of science, art, foreign law, or handwriting, but such opinions must be directly connected to the facts in issue. A case may be lost or won on the strength of the evidence that has been admitted or rejected, as the case may be. Amupitan, appropriately describes the concepts of admissibility and relevance as "the foundational topics in the law of evidence".[32] To the Supreme Court, the concepts of admissibility and relevance constitute the heart-beat, centre-pin and pivot of the law of evidence.[33]

The golden rule of admissibility expresses itself in the notion that all evidence which is relevant is admissible; logically, the corollary is correct. It follows therefore that what is not relevant is inadmissible.

A clearer argument would be to buttress that if evidence is to be admitted in court, it must first and foremost pass through the crucible of relevance. It must be relevant to a material fact in a case. The Supreme Court puts it more succinctly in the following words:

> *Admissibility of evidence is based on relevance. A fact in issue is admissible if it is relevant to the matter before the court. In that respect, relevancy is a precursor to admissibility. Flowing from the above, what is relevant is admissible and what is not relevant is not admissible*.[34]

The fundamental issue that must be addressed here is the true meaning of the word "relevance". The word is, undoubtedly, a familiar one in the ordinary parlance and usage, yet it is one word that does not render itself to easy legal definition. This is because, what is relevant is a matter of fact which depends on the peculiar circumstances of each case.[35] It is, therefore, difficult to formulate a one-sentence definition of the word that will satisfy all cases and circumstances. Perhaps, this explains why the definition of the word is conspicuously omitted in the Evidence Act, 2011.

What the Act does is to provide a guide as to what facts may be considered relevant.[36] In this regard, much responsibility is placed upon a trial court to determine which facts are relevant and which facts are not, as a trial court is both a court of facts and law.[37]

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[31]See Section 70 of the Evidence Act, 2011; In *Ibrahim v Barde,*[31]the court accepted a book written by the witness "D.W.4" as recognized authority to prove Suleja custom.
[32]J O Amupitan, Evidence *Law: Law and Practice in Nigeria*, (Innovative Communications Press, 2013) p 48
[33]Per Ogundare, JSC in *Ezekwesili & Ors. v Agbapuonwu & Ors* (2003) 9 NWLR (Pt. 825) 337.
[34]*Nwabuaku v Onwordi* (2006) ALL FWLR (Pt. 331) 1236 at P. 1251. See also *Ogu v Manid Technology & Multipurpose Co-Operative Society Ltd*, Court of Appeal Suit No: CA/A/230/2009, High Court Suit No. HC/KK/030.CV/2004; reported in (2011) 26 E-WRN/104 (CA), (2010) LPELR-4690 (CA), (2010) JELR 47678 (CA)
[35]*Okonji v Njoanma* (3) (1999) 14 NWLR (Pt. 638) 250
[36]See sections 5 – 13 of the Evidence Act, 2011
[37]*Ayeni &ors v Dada & ors* (2003) 8 NWLR (Pt. 823) 583

In considering whether or not any fact is relevant, the court will consider the nature of the transaction or the nature of the fact that is being sought to be proved. In the opinion of Dada,[38] a fact is relevant if:

i. It applies to a matter at hand;
ii. It is logically connected and tending to prove or disprove a matter in issue, or having appreciable probative value; and
iii. It tends rationally to persuade the adjudicating tribunal in an attempt to prove or disprove a fact.[39]

One conclusion that can be drawn from the above definitions is that, in order for a fact to be considered relevant, it must have the effect of rendering more or less probable, the existence or non-existence of any fact which is in issue.

As regarding electronic evidence, section 84 of the Evidence Act 2011 deals with the requirements as well as the procedure for admissibility of computer-generated evidence. In *Kubor v Dickson,*[40]an uncertified internet print-out of a newspaper was rejected for not being tendered in compliance with Section 84 of the Evidence Act 2011. Section 84, it must be noted, has not abrogated rules such as certification of documents as required under section 104 of the Evidence Act 2011.

Does section 84(4) Allow for Oral Evidence?

In *R v Shepherd*[41], the above poser confronted the English court Coram Lord Griffiths. In answering the question, the court made copious reference to the provisions of the Police and Criminal Evidence Act 1984; which incidentally happens to be squarely on all fours with section 84 of the Evidence Act, 2011. The court went further to hold that the conditions for the admissibility of electronic evidence could be satisfied by oral evidence or certificate. Perhaps, in *Sylva v Dickson*[42], the Supreme court quoted with approval the decision of Lord Griffiths on the subject matter and held that the four conditions stipulated under section 84 (2) of the Evidence Act can be satisfied either by certificate pursuant to subsection (4) of section 84 or by oral evidence subject to the direction of the court.

In addition to the above *Jubril v FRN*[43] , the Court of Appeal in resolving the issue held that it is now well established that the requirement of section 84 (2) as well as (4) of the said Act can be satisfied by oral evidence of a person familiar with the operation of the computer as to reliability and functionality. More so, in *Adeyela & Anor v Safiriyu &Ors,*[44]the appellant sought to tender from the Bar certified true copy of the smart card readers report with a certificate attached. The Tribunal rejected the document on the ground that same cannot be tendered from the bar. It would appear that the tribunal in this scenario wanted a person familiar with the operation of the smart card reader especially as to reliability and functionality. Indeed, these changes reflect the reality of how evidence is generated and used in today's world, and should make it easier for courts to deal with electronic evidence of an expert witness.[45]

[38]J A Dada, *The Law of Evidence in Nigeria* (2nd edn., University of Calabar Press, 2015).
[39]Ibid, p 87.
[40](2013) 4 NWLR (PT 1345) 534, Particularly per Onnoghen, JSC, at p. 578
[41](1993) 1 ALL ER 225
[42] (2017) 8 NWLR (Pt 1567) 167
[43](2018) LPELR- 43993(CA)
[44][2015] LPELR-41782 (CA)
[45] See O C Aduma & H O Obi, 'An Examination of the Evidence (Amendment) of 2023', *Awka Capital Bar Journal* (ACBJ) (2024) 3(2) 31

B. Qualifications and Competence of the Expert

The expert must demonstrate sufficient skill, knowledge, training, or experience in the relevant field. Section 68 of the **Evidence Act 2011** describes an expert as someone "specially skilled" in the subject matter. The Nigerian courts have interpreted this broadly, holding that formal academic qualifications are not always necessary if the individual can prove expertise through training and practical experience. In *Bayo Ayadi & Ors v Mobil Producing Nigeria Unlimited*,[46] the Court held that the requirements of the law as regards admissibility of expert opinion is significantly based on the discretion of the trial judge as provided by the provisions of section 68 of the Evidence Act 2011. The court must be satisfied as to the qualifications or credentials of the expert witness on the subject matter. There is no requirement that the necessary skills be acquired through formal education.[47] In ***Esso West Africa Inc. v Oyegbola,***[48] the court admitted the evidence of a handwriting expert on the basis of demonstrated competence rather than academic degrees. Similarly, in ***Okoh v State,***[49] the Supreme Court held that the essential criteria for qualifying an individual as an expert are demonstrable skill and proven competence, rather than mere titles or formal qualifications.

C. The Subject Matter of the Evidence

The core principle of expert evidence is that it must provide information beyond a layperson's understanding. This "necessity doctrine" exists because courts and juries often lack the specialized knowledge to decipher complex technical or scientific issues. Section 68 of the Nigerian Evidence Act 2011 sets a threshold requirement by limiting admissibility to matters involving specialized knowledge that lies beyond the scope of ordinary experience. In the case of *Egesimba v Onuzuruike*,[50] the Supreme Court held that the evidence of an expert witness is only necessary if, by the nature of the evidence, scientific or other technical information outside the experience and daily common knowledge of the trial Judge is required.

As such, an expert must have a particular and special knowledge of the subject; as such he will only be required when the expert can provide the court with scientific or other information of a technical nature that is likely to be outside the experience and knowledge of the Judge.[51]

D. The Basis of the Opinion Must Be Demonstrated

A fundamental requirement for the admissibility of expert testimony is that the expert must not only state an opinion but also demonstrate the reasoning, methodology, and factual basis upon which that opinion rests. Nigerian courts have consistently held that an unsupported opinion, one that merely asserts a conclusion without explaining how it was reached carries little or no evidential value.[52]

Section 68 of the Evidence Act 2011 recognizes expert opinion as relevant, but the probative value depends on whether the opinion is properly grounded in verifiable facts or recognized principles within the expert's field. An expert who fails to demonstrate the basis of his conclusion leaves the court with speculation rather than assistance.

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[46] (2016) LPELR-41599(CA).
[47] See Sharing *Cross Educational Service Limited v Umaru Adamu Enterprises Limited & Ors* (2015) LPELR-24661(CA
[48] (1969) 1 NMLR 194
[49] 2014) LPELR-22589(SC)
[50] (2002) LPELR - 1043 (SC),
[51] *Egesimba vs. Onuzuruike* (2002) LPELR- 1043 (SC), per Tobi, JSC .
[52] See *Amodu v Amode* (1990) 5 NWLR (Pt. 150) 356 at 370

In *Okoh v State,*[53] the Supreme Court held that it is not enough for an expert to present a mere assertion; the court must be satisfied that the conclusions be supported by established facts and reliable methodologies, ensuring that the evidence presented is not only expert opinion but also demonstrably grounded in fact and sound reasoning.

The rationale behind this requirement is twofold. First, it enables the court to scrutinize whether the opinion is credible, logical, and consistent with the facts in issue. Second, it prevents undue deference to the authority of the expert, reminding the court that the ultimate decision-making power lies with the judge, not the witness.[54] Thus, to be admissible and persuasive, an expert must show the data, observations, tests, or scientific principles that informed their opinion. For instance, a handwriting expert must not simply state that two signatures are identical but must point out the similarities, strokes, and characteristics relied upon. Only when the basis of the opinion is transparent can the court properly assess its weight.

5. Challenges in the Admissibility of Expert Evidence in Nigeria

The admissibility of expert evidence in Nigeria is fraught with several challenges that continue to undermine their effectiveness in judicial proceedings. One major challenge is the issue of conflicting expert opinions. In many cases, parties engage different experts who arrive at opposing conclusions on the same set of facts, leaving the court in a dilemma as to which opinion to rely on. Another challenge is the lack of a clear regulatory framework governing who may qualify as an expert witness. While section 68 of the Evidence Act 2011 defines experts broadly as persons "specially skilled" in a particular field, it does not provide specific standards for accreditation, licensing, or professional accountability. This vagueness allows virtually anyone with some level of experience to present themselves as an expert, raising concerns about competence and reliability. Bias and partisanship also remain significant problems. Experts are usually hired and paid by parties, which may create an incentive to tailor opinions in favour of the side that engages them. The courts have repeatedly warned against partisan experts, noting that their evidence may be unreliable if it appears motivated by advocacy rather than objectivity.[55]

Further, there is a general lack of trust by courts in expert evidence, leading to judicial reluctance to place heavy reliance on it. Nigerian judges often stress that expert opinions are merely advisory and not binding, thereby diminishing their practical impact even when properly admitted. This problem is compounded by the fact that some judges, lacking technical background, may struggle to evaluate complex scientific evidence effectively.

Lastly, procedural delays and costs associated with securing credible experts also pose challenges. Many litigants, especially in criminal cases or civil disputes involving indigent parties, cannot afford the high fees charged by professionals, resulting in unequal access to justice. The absence of state-funded expert services in most courts further aggravates this problem, as parties are left to source for experts privately.

6. Conclusion and Recommendations

The admissibility of expert evidence in Nigeria remains a vital element in the quest for justice, particularly in cases involving technical, scientific, or specialized issues that lie outside the ordinary competence of judges. Section 68 of the Evidence Act 2011 provides the statutory framework for expert testimony, while judicial decisions have further emphasized requirements such as relevance, competence, impartiality, necessity, and the demonstration of the basis of an opinion. However, despite these provisions, significant challenges persist, including conflicting expert opinions, the absence of a comprehensive regulatory framework, bias resulting from partisanship, judicial

[53] (2014) LPELR-22589(SC).
[54]See *Seismograph Service (Nigeria) Ltd v Ogbeni* (1976) 4 SC 85.
[55] See *Okoh v State [2014] LPELR-22589(SC)*).

skepticism about the reliability of expert evidence, and financial constraints that limit access to qualified professionals. These problems collectively undermine the effectiveness of expert testimony and often reduce its utility in the judicial process.

To address these issues, there is a need for reforms aimed at strengthening the credibility and reliability of expert evidence in Nigerian courts. A regulatory framework should be introduced to standardize qualifications and accreditation of experts in order to ensure competence and accountability. Judicial practice directions should also be developed to guide courts on how to evaluate and weigh expert testimony. Judges and lawyers require regular training on scientific and technical evidence to improve their ability to scrutinize expert opinions. Furthermore, mechanisms that minimize bias, such as the greater use of court-appointed experts, should be encouraged, while the state should provide access to expert services in criminal and public interest cases to guarantee equal justice for indigent litigants. Amending the Evidence Act to provide clearer standards, including a requirement that the basis of every expert opinion be demonstrated, would also strengthen admissibility rules. If implemented, these reforms would enhance the integrity of expert testimony and reinforce the capacity of the Nigerian judicial system to deliver fair and credible justice