



## Harmonisation of data collection standards informal cross-border trade: An analysis domestic legal framework for implementation of the African Union guidelines to foster AfCFTA adoption

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### Abstract

Informal Cross-border Trade (ICBT) is reported to contribute substantially to the economies of several African countries. Its contribution is reported to exceed the value of formal trade in some African countries. Despite the commendable contribution and impact on lives across Africa, quantification of the volume of ICBT continues to elude us. This gap has severe consequences on the operationalisation of the African Continental Free Trade Area (AfCFTA). This exclusion demonstrates that the value of trade on the continent is not adequately captured, policies made may not be adequate, and state parties may not effectively deploy tools to close balance of payment gaps. Hence a need to efficiently capture the contribution of informal trade to Africa's economy and to develop effective formalisation tools. State parties are at different levels of collation of these data. Given the pertinent role that data plays in the success of economic integration and the AfCFTA, the African Union (AU) developed guidelines for producing statistics on ICBT. Nigeria as a state party to the AfCFTA will be required to comply with these harmonisation guidelines. This paper analysis the legal framework for implementation of the guidelines with a view to ensure alignment with the national trade data capture legal framework for efficient implementation

**Keywords:** AfCFTA, ICBT, informal trade, balance of payment, trade statistics, economic integration, trade, data, intra-African trade, harmonisation, regional trade, regional integration

### Introduction

Data on intra-Africa trade generally indicate that the volume of intra-African trade is low <sup>[1]</sup>. This has been attributed to statistics not capturing the volume and value of Informal cross-border trade (ICBT) despite it being the prop of livelihoods of millions of Africans <sup>[2]</sup>, and it being estimated to be equivalent to 7 and 16% of formal trade, and equivalent to between 30 to 72% of formal trade between neighbours <sup>[3]</sup>. Although there is no widely accepted definition of ICBT <sup>[4]</sup>, ICBT has been defined as referring to "transactions in goods and services between any two or more countries that are not entered in the official records and therefore not included in the official trade statistics". For an area that has the most impact on lives and the economy across the continent, and one that makes substantial contribution to the continent's economy, <sup>[5]</sup> its exclusion from Africa's trade statistics does not give a clear picture of the volume and value of trade on the continent. Furthermore, such exclusion has adverse implications for policy, planning and strategy in African Union (AU) member states. In 2023, a methodology was developed to estimate the value of ICBT in Africa <sup>[6]</sup>. Furthermore, the AU developed a manual to guide state parties on the production of ICBT statistics. Surveys conducted using the guidelines would influence the formulation of policy and regulatory framework that could enhance the role of informal cross-border trade and its mainstreaming into the formal economy. This will allow each state party to consider their peculiarities in developing data capture frameworks. The integration of informal trade into formal merchandise trade is crucial as it will enhance comprehensiveness of information on AfCFTA State Parties' GDP and Balance of Payment (BoP) statistics.

This paper analyses the AU guidelines on the Production of Informal Cross-border Trade Statistics 2024 and the legal implementation framework to ensure alignment with other data protection obligations and legal instruments. The paper

starts with an introduction, section two analyses the AU guidelines for production of ICBT statistics. Section three reviews the legal implementation framework for producing ICBT statistics. Section 4 identifies challenges, made observations and recommendations on way forward. Section five concludes the paper with some final thoughts

### The African Union Guidelines for Informal Cross-Border Trade Data Statistics

the AU developed Guidelines for the Production of Informal Cross-Border Trade (ICBT) Statistics. The guidelines are derived from the Strategy for the Harmonisation of Statistics in Africa (SHaSA) which was developed in 2009 and updated in 2017 <sup>[7]</sup>. This is the AU's strategy to secure reliable and harmonised statistics for all areas of regional integration <sup>[8]</sup>. This recognises the role of statistics in targeted policy and planning, and is against the backdrop of the need to harmonise trade statistics production to enhance the quality and coverage of trade statistics. Its aims to enhance coordination and foster collaboration among State Parties. In furtherance of its economic integration agenda, the AU strategy adapts international rules, norms, standards and best practices on statistics production to the realities of Africa <sup>[9]</sup>. This informed the development of the practical guidelines. The guideline seeks to harmonise compilation and production of ICBT trade statistics on the continent to provide comprehensive statistics which could feed into Africa's International Merchandise Trade Statistics (IMTS) and provide the necessary data to identify and resolve balance of payment disparities and inconsistencies across AU member states. Through harmonisation, the guidelines align the compilation of Africa trade statistics with the IMTS Manual.

The guidelines manual is divided into four chapters dealing with conceptual framework for ICBT, ICBT methodologies, data analysis and ICBT survey management. Chapter one provides the objectives of the manual which includes to

recommend methodological approach to production of ICBT statistics. This involves administering surveys at borders to determine the share of ICBT in IMTS and the Gross Domestic Product (GDP) of state parties. It expects state parties to develop minimum indicators, and develop the institutional framework, processes and procedures that will facilitate the realisation of the objective of the manual. The ICBT survey which the guidelines seek to support aims to determine the direction of trade, estimate the values and quantities of flows, determine the composition of transacted commodities, determine demographic and characteristics of trade, determine the uprating/ extrapolating techniques for collected data, integrate the uprated data to formal collected data, and enable comparative analysis of formal and informal trade.

The survey to be carried out using these guidelines is expected to cover recorded commodities, recorded borders and timeline for data collection. Recorded commodities are expected to cover goods and services that have not been recorded by customs, except personal effects and illegal goods [10]. Borders to be recorded include official and unofficial borders or crossing points. State Parties are allowed to extrapolate data where limited resources prevent the conduct of survey in all crossing points Timeline for data collection is expected to consider transactions that occur on all days of the week Extrapolation is also allowed for days where data could not be collected due to limited resources. Year-round monitoring is also recommended for agricultural product cycle, and random selection for trade variability.

Importantly, the manual defines ICBT as “transactions in goods and services between any two or more countries that are not entered in the official records and therefore not included in the official trade statistics.” and aligns the meaning of goods and services to those provided Goods and services should be defined as per the IMTS and the Manual on Statistics of International Trade in Services (MSITS) respectively, and clearly indicated that the scope of the AU methodology only applies to trade in goods. This therefore provides a definition of ICBT for the African continent. The data collection technique recommended in the

guidelines includes direct observation and measurement which involves observation of activity, behaviour, relationship, phenomenon, network or process at loading and off-loading sights, and at border crossing sites; interview involve interviewing either individual traders or groups of other stakeholders; and stock taking involves determining the difference between opening and closing stock to estimate unrecorded trade at open border markets on well-recognised market days at landing and off-loading sights.

On valuation, the manual recognises that although the IMTS recommends exports and imports to be valued based on Free on Board (FOB) and Cost of Insurance and Freight (CIF) respectively, that when it comes to ICBT, FOB and CIF are considered to be equal given that such trade normally occurs between two neighbours.

As recommended by IMTS 2010, Exports are to be valued FOB (Free on Board) while Imports are to be valued CIF (Cost Insurance and Freight). However, given the fact that ICBT generally takes place between two neighbouring countries, FOB and CIF value are in most instances equal. On the use of technology for data collection on ICBT, the manual recommends the following: Paper-Assisted Personal Interview (PAPI), and Computer-Assisted Personal Interview (CAPI) that is correct and equivalent to PAPI instruments.

The manual focuses on the use of most common technologies for data capture, including Paper Assisted Personal Interview (PAPI) and Computer Assisted Personal Interview (CAPI), video surveillance, software, satellite imagery and Geographical Information System (GIS). It also cautioned that the implication of new technologies on survey is yet to be fully understood.

Chapter one concluded with a report on a survey administered to member states to assess their engagement in ICBT data collection. 32 out of the 47 respondents indicated that they had never conducted ICBT survey, while 15 others had conducted the survey. The report identified patterns of ICBT data collection practices from 5 countries across the continent. In addition to the 5 patterns highlighted, surveys done by other countries will also be highlighted.

Country	Commencement date	Data collection technique	Data collection instrument	Coverage
Cameroun	Monographs from 2011 Surveys from 2013	<ul style="list-style-type: none"> <li>▪ Econometrics</li> <li>▪ Annual surveys</li> </ul>	Transaction history	Not indicated
Rwanda	2009	Computer assisted interviews using tables since 2016	Whole year coverage	18 official borders and 39 crossing points bordering 4 countries, Burundi, Democratic Republic of Congo (DRC), Tanzania and Uganda
Uganda	Started 2005 but took off fully in 2014	Direct observation	Surveys	20 border posts bordering 5 countries DRC, Kenya, Rwanda, Tanzania, South Sudan; and collection from 4 bus terminals covering Kampala/Kigali, Kampala/Juba, Kampala/Bujumbura and Kampala/Bukoba/Dar es Salaam
Zambia	2019	<ul style="list-style-type: none"> <li>▪ census</li> </ul>		Covering 4 formal borders out of 36 neighbouring 4 countries Malawi, Zimbabwe, DRC, and Tanzania
Other Surveys				
Nigeria	2013	<ul style="list-style-type: none"> <li>▪ border monitoring</li> <li>▪ surveys</li> </ul>	Selected weeks for the Whole year coverage	16 borders neighbouring Cameroon, Benin Republic and Niger
Sierra Leone	2024	<ul style="list-style-type: none"> <li>▪ FOB and CIF valuation</li> <li>▪ Questionnaires</li> <li>▪ Direct observations</li> </ul>	Electronic data collection using smart phones and tablets	20 trade points out of 185 crossing points neighbouring (Republic of Guinea and Liberia)
Namibia	2014	<ul style="list-style-type: none"> <li>▪ Measurement</li> <li>▪ Interview</li> <li>▪ questionnaires</li> </ul>	Specified month November	4 border posts neighbouring Angola and Zambia
Kenya	2011	<ul style="list-style-type: none"> <li>▪ purposive selection</li> <li>▪ Direct observation</li> <li>▪ uprating</li> </ul>	2 <sup>nd</sup> and 3 <sup>rd</sup> weeks of June 2011	13 out of 24 border stations neighbouring Tanzania, Uganda and Ethiopia

The report observed that Rwanda had continuously monitored all its borders since 2012, while Cameroun, Uganda and Zambia monitored their borders partially in time and space. It also observed that although the methodology adopted by Rwanda is reliable, implementation is difficult due to high-cost implication, while that adopted by Cameroun, Uganda and Zambia is reliable where good estimation methods are applied. Their methodology requires strong fieldwork organisation and supervision.

Limitations observed in the report include:

1. Poor representativeness of transit points due to cost and logistics constraint.
2. Collection was mostly during the day between 7am to 6 pm hence, not capturing substantial volume of trade which takes place at night.
3. Interference by customs during interview times.
4. Data collected for 7 or 14 days while gross amount for remaining day is calculated using extrapolation method. This impacts the reliability of the estimates.

Chapter two described in detail the methodology used to measure ICBT transactions noting how ideal it is to undertake systematic and exhaustive data collection after having identified all crossing points. It further noted that resource constraint such as logistics and high-cost implications makes it impossible or unfeasible it is to achieve this ideal. Nevertheless, to operate within these resource-constrained environments, the guidelines proposed census method, estimation method and econometric model as the three methodologies to be adopted in measuring ICBT.

The census method involves observing gazetted and no-gazetted border. Strong field organisation and supervision are key to successful deployment of this methodology, and it is also expensive. Estimation method involves data collection at selected crossing points for 1 or 2 weeks and extrapolating for the remaining days. It is less expensive and implementable, and also requires strong fieldwork organisation and supervision, and specified advanced estimation technique for selected crossing points.

The second chapter: Informal Cross Border Trade methodologies details the two methodologies used to compile ICBT data in Africa. Those methodologies are the census method (full coverage) and the estimation method (coverage of a few crossing points, which are extrapolated to have an estimated value of ICBT flows at all crossing points). Stratified sampling and purposive sampling were recommended as sampling method for selecting crossing points, and updating technique for the purpose of estimation. The use of econometric model is recommended to record large scale informal trade by registered traders. It explores linkages between the values and quantities of import and export on one hand, and tax receipts/ tax rate on the other. Through this process, observed tax evasion will be imputed as informal trade. the chapter also recommended the minimum variable which every survey questionnaire should contain.

Chapter 3 analyse the impact of data collection tools on data processing, while analysing the prons and cons of the various tools used by responders of the survey discussed earlier, such as remote sensing, paper-based data collection (PAPI) and computer assister personal interviews (CAPI). On data analysis, the guidelines analysed the six steps in

data processing cycle to guide users. It also detailed the and recommended the use of Stata statistical software and five steps for data cleaning mapping. It also recommended main tables to be produced for comparison basis. This will assist countries in their comparative analysis.

The third chapter: Data analysis includes notes on data processing, tabulation, report writing, publication and dissemination. It also recommended dissemination strategies, including quarterly ICBT report, official website, social media, and STATAFRIC social media and official website.

Chapter 4 of the guidelines is devoted to survey management, covering institutional arrangements, budgeting, recruitment of field staff, responsibilities of different interveners, and recommendations on steps that NSOs and their stakeholders should follow. On institutional arrangement, it highlighted the need for synergy between stakeholder institutions and recommend the use of memorandum of understanding with clearly assigned responsibilities. Also recommended is the creation of a steering committee at the managerial level, and a technical committee at the technical level to manage the entire survey process. it further recommended five institutional frameworks for ICBT management. These include administrative coordination aspects, technical coordination aspects, steering committee, technical committee, and memorandum of understanding respectively. It emphasised the significance of budgeting to the success of survey management and recommend members of the technical committee to prepare exhaustive budget fort he approval of steering committees. On recruiting field staff, it recommends recruiting locals at regional level at cross proximity to crossing points to leverage language and comfort with working at location. Level of education and training of enumerators are also to be considered. On responsibilities of different interveners, the guidelines recommend responsibilities for technical team and enumerators. At the end of the manual, 17 steps were recommended for NSOs and their stakeholders to followed by AU state parties that seek to embark of ICBT survey.

### **Legal Framework for Implementation in Nigeria**

The IMTS concerns the provision of data on the movement of goods between countries and areas to provide quality and timely statistics that support informed decision-making <sup>[11]</sup>. These statistics are useful to various stakeholders such as the government, the public, researchers, businesses, and institutions at regional, continental, and global levels. <sup>[12]</sup> An effective legal framework needs to be put in place to ensure that trade data is produced within the confines of the law. This requires adequate international, regional and national legal frameworks to ensure accuracy, reliability and usability of data. Hence the need to analyse the legal framework for the production of ICBT statistics at national level. In this regard, Nigeria has been selected given that it is in the process of domesticating the guidelines.

When it comes to formal trade statistics, the legal framework for the production of trade statistics include several customs related conventions and agreements of the World Customs Organisation such as the Convention on the Valuation of Goods for Customs Purposes, <sup>[13]</sup> those of the World Trade Organisation (WTO), the African Continental Free Trade (AfCFTA), regional agreements such as the Agreement the Southern African Customs Union (SACU),

the ECOWAS, the West African Economic and Monetary Union (UEMOA), East African Community (ECA), the Economic and Monetary Community of Central Africa (CEMAC) are instructive. At the national level, the legal framework needs to align with various international obligations such as those highlighted above, to ensure compliance.

For instance, the IMTS envisages a national legal framework to cover Legal acts governing customs records which includes customs-related instruments such as those mentioned earlier, and the national customs-related instruments; legal acts governing non-customs data sources such as enterprise surveys, tax records, postal records, currency exchange records, shipping manifest, etc; legal acts regulating institutional arrangements; legal acts protecting confidentiality of traders and trade information such as treatment of customs declaration documents with confidentiality by non-customs agencies, treating trade statistics, commercial information, and personal information with confidentiality<sup>[14]</sup>. What that means for the production of ICBT statistics across the AU member states is that there should be robust legal frameworks in place to produce the data obtained during these legal acts.

This is pertinent considering the production of ICBT statistics involves non-customs related data which also border on legal acts requiring the protecting of confidentiality such as personal information and commercial information in some instances. To demonstrate this, the legal framework for the production of ICBT statistics shall be reviewed. In addition to the IMTS guidelines, the AfCFTA Protocol on Digital Trade is also useful. It deals with '... digitally enabled transactions in goods and services that can either be digitally or physically delivered...'. Its objectives include "... c. create a transparent, predictable, secure, and trustworthy digital trade ecosystem for businesses and consumers; f. encourage trusted, safe, ethical, and responsible adoption and regulation of the use of emerging and advanced technologies to support and promote digital trade;". Also important is the Protocol on Trade in Goods and its annexes. On legal acts that are non-customs, they will require consideration of the various laws governing the agencies that have mandates depending on the goods in question. For instance, where it has to do with food, the National Agency for Food and Drug Administration and Control (NAFDAC) Act will be applicable. This will also make NAFDAC a critical institution to collaborate with.

On confidentiality of data the Nigerian Data Protection Act will be applicable,<sup>[15]</sup> and the Nigerian Data Protection Commission will be an institutional stakeholder in the process. The Act includes principles and lawful basis governing processing of personal data, rights of a data subject, data security and importantly, cross-border transfers of personal data.<sup>[16]</sup> S.25(1)(a) of the Act provides that a data protection is lawful where the subject gives, and does not withdraw consent, and that processing is necessary for specified reasons including (ii) compliance with legal obligations for which the data controller or data processor is subject, (iv) the performance of task carried out in public interest or in the exercise of official authority vested in the controller of data or processor. S. 25 (2) also clearly states purposes that are considered not legitimate. These include those that override fundamental rights such as right to privacy for example, or the subject does not reasonably

expect the data to be processed in the manner envisaged. S.27 provides guidelines on information to be given to the subject before obtaining data, while S.28 requires data privacy impact assessment to be done where data processing is likely risk to rights and freedom of the subject. S.29 imposes some obligations on the data controller and processor, while S.30 protects sensitive personal data.

Although non-customs-related data is being spotlighted here, the Nigerian Customs Service Act 2023 is also relevant given that the guidelines recommend the use of econometrics to determine the value of large trade transactions undertaken by formal businesses. This will require the provision of customs documentation that will be used to determine the value of the trade transactions.

In Nigeria, various trade-related agencies produce and use trade statistics. For example, in 2013, the Central Bank of Nigeria (CBN) conducted a survey on ICBT,<sup>[17]</sup> while the Nigerian Export Promotion Council (NIPC) had been doing some work on that. The National Bureau of Statistics (NBS) is responsible for the development and management of official statistics and is the authoritative source and custodian of official statistics for Nigeria<sup>[18]</sup>. This includes ICBT data which is under review in this paper. therefore, the NBS is expected to consider the provisions of the Nigerian Data Protection Act in the production of ICBT statistics.

### Challenges, Observations and Recommendations

**a. Challenges:** The country review discussed in section 2 highlighted some challenges faced during ICBT statistics production. They include:

1. security challenges which resulted in non-coverage of some crossing points.
2. Data collection mostly during official working hours which exclude data capture at nighttime which is reported to be a crucial time for loading and off loading at some crossing points.
3. High-cost implication
4. Logistics challenges

### b. Observations

1. In addition to these challenges, data protection could be a concern for some crossing points.
2. The AFREXIM Africa Trade Report 2024 observed that intra-Africa Trade remains low compared to other regions of the world<sup>[19]</sup>. However, literature and reports indicate that the volume and value of ICBT is mostly not captured in Africa's statistics. This could result from the fact that many State Parties' official trade reports only cover formal trade as envisaged by the IMTS guidelines.
3. The AU guidelines, is an indigenous adaptation to capture ICBT and reflect same into State Party's official trade statistics. This is a game changer that could ensure that state parties develop efficient frameworks for the production of ICBT statistics.

### c. Recommendations

- 1 As state parties develop their legal frameworks for capturing ICBT, they should consider and have at its core data protection and management given the non-customs nature of the data that could be collected and processed.

- 2 Enumerators should be adequately trained on data protection and handling given the potential benefit of using locals from the crossing points. For instance, Part V of Nigeria's Data Protection Act 2023 provides principles and lawful basis for processing of personal data (sections 24-33). This will guide the trainers and trainees on data protection.
- 3 Enumerations should also be sensitised on the importance of consent to the entire exercise.
- 4 In considering data protection and management, state parties should also consider the AfCFTA Protocols on Digital Trade and Trade in Goods to ensure the development of responsive and resilient statistics production legal framework.

### Conclusion

ICBT plays a significant role in Africa however, its impact is not fully captured to enhance economic development. Capturing this data becomes pertinent for sustainable development on the continent given the role of data in policy and planning. Most importantly, the production of ICBT statistics will enable state parties to the AfCFTA Agreement to develop targeted initiatives, incentives, policies and tools that could seamlessly formalise informal trade and make the contribution of Micro, Small and Medium Enterprises (MSMEs) take their rightful place in the sustainable growth of trade on the continent and increasing its share of global trade.

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