

**DRAFT**  
**E-Commerce National Strategy of Ghana**  
**2025-2029**

*FOREWORD by the Minister of Trade, Agribusiness and Industry*

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## **1 INTRODUCTION**

### **1.1 Ghanaian government policies on digital economy and e-commerce**

The national e-commerce strategy of Ghana reflects the long-term government's commitment to advancing the digital economy and e-commerce. This dedication to fostering digital transformation has been highlighted through several national initiatives such as the *Ghana e-transform project* (2013), the *Ghana's digital agenda* (2018), or *Ghana beyond aid charter and strategy*<sup>1</sup> (2019).

The ambition of the Ghanaian government took a significant leap forward with the Ministry of Communication and Digitalization (MCD) announcing its “*objective to establish Ghana leader in Africa for the digital economy by 2028*”. This ambitious goal has been accompanied by the launch of both the *Ghana digital acceleration program* from the Ministry of communication and digitalisation (2022-2027) and the *5-year strategic plan* from the National Communication Authority (2024-2028).

In this context, the national e-commerce strategy has been designed to achieve the holistic vision of the government in the development of its digital economy. It provides an integrated and coordinated national approach to e-commerce development, extending beyond sectoral strategies and a purely ICT or digital focus.

### **1.2 Key preliminary stages in the development of the national e-commerce strategy**

#### **1.2.1 eTrade Readiness Assessment of Ghana (2023)**

The preparation of this national strategy dedicated to e-commerce in Ghana is the culmination of a multi-stage process, resulting in particular from the Ghanaian eTrade Readiness Assessment (eT Ready) carried out by the United Nations Trade and Development (UNCTAD) in 2023.

Following a request for the support of UNCTAD by the Ministry of Trade and Industry (MOTI) in January 2023, a series of workshops bringing together all stakeholders through national consultations took place in Accra in March and September 2023. The official national launch of Ghanaian e-commerce

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<sup>1</sup> [http://osm.gov.gh/assets/downloads/ghana\\_beyond\\_aid\\_charter.pdf](http://osm.gov.gh/assets/downloads/ghana_beyond_aid_charter.pdf)

readiness assessment took place in November 2023 in Accra under the aegis of the Minister of Trade and Industry before it was presented at the eWeek in Geneva (December 2023).

This assessment has exhaustively reviewed the challenges of the prerequisites for e-commerce through seven policy areas, using UNCTAD's methodology: (1) E-commerce strategy formulation; (2) ICT infrastructure and services; (3) trade logistics and trade facilitation; (4) payment solutions; (5) legal and regulatory framework; (6) e-commerce skills development; (7) access to financing.

### **1.2.2 Initiation of the elaboration of the national e-commerce strategy (2024)**

Following the adoption of the assessment, the MOTI has promptly requested UNCTAD's support for the development of a national e-commerce strategy. This request aligns with the assessment's recommendation to provide a cohesive, integrated vision for all the e-commerce stakeholders in the country.

The preparation of the e-commerce strategy and the definition of its strategic orientations were based on this assessment, with continuous updates where necessary to reflect the evolving prerequisites for e-commerce development in a continuous interaction with Ghanaian e-commerce stakeholders.

The national consultations organized in June 2024 in Accra have provided a valuable platform to present, discuss and validate the strategic orientations of the national e-commerce strategy. A wide range of stakeholders from both private and public sectors participated, highlighting notably the need to delve deeper into certain aspects specific to the “business dimension” of e-commerce.

### **1.2.3 Methodological approach to developing Ghana's national e-commerce strategy**

The methodological approach adopted was based on an inclusive and participatory consultation process, leveraging a series of workshops and national consultations conducted through 2023 in the context of the assessment to deepen even further the interactions and discussions with various stakeholders.

- Interactions with e-commerce stakeholders (March - June 2024)

Various national e-commerce stakeholders, including Ministries, regulatory authorities, public enforcement agencies, private-sector organizations, e-commerce companies and consumer associations, were solicited to promote information sharing and update data from 2023. These actors,

who had previously participated in the eTrade readiness assessment, benefited from established channels of communication, facilitating deeper discussions. These consultations helped identify key sector priorities and refine the UNCTAD evaluation.

- Documentary review and update of strategic diagnosis (March-June 2024)

The consultation phase held as part of the eT Ready was completed, incorporating feedback from national e-commerce stakeholders along with documentary and statistical reviews.

This updated assessment not only revealed the sector's challenges and needs, but also highlighted the concomitant actions already considered through complementary strategies, in order to identify the strategic orientations underpinning the preparation of the e-commerce strategy, and to avoid redundancies and replications, ensuring efforts are aligned and public action optimized.

- National consultations to validate the updated assessment and orientations of the national e-commerce strategy (June 2024)

A national consultation and dialogue phase then took place in Accra during the last week of June, bringing together the previously mentioned stakeholders. These consultations provided an opportunity to present and review the updated strategic diagnosis, followed by discussion to validate the resulting strategic orientations for the national e-commerce strategy.

The consultations took place in three steps:

- (1) a first session presented the key findings of the updated Ghana eT Ready and the resulting suggested strategic orientations for the national e-commerce strategy;
- (2) various national stakeholders, notably from Ministry of Trade and Industry, Ministry of Communication and Digitalization, Ghana Enterprise Agency, Bank of Ghana, National Information Technology Agency and representative from private sectors, shared their views on the vision of the e-commerce strategy;
- (3) subsequent sessions were organized to review and evaluate each proposed strategic orientation for the national e-commerce strategy. These sessions aimed to collect feedback and input from both private and public participants, ensuring that the strategy is developed as a truly collective collaborative effort.

Those consultations facilitated fruitful and cross-sectional discussions and debates, resulting in the validation of both the updated eT Ready and the proposed strategic orientations at the core of the national e-commerce strategy.

Finally, a last session was dedicated to the next steps, including key components of the e-commerce strategy implementation plan, the governance framework, monitoring mechanisms, and the evaluation framework.

The elaboration and preparation of this national strategy were achieved in accordance with the recommendations and with the constant support of MOTI.

## **2 SITUATIONAL ANALYSIS**

### **2.1 Overview and strategic diagnosis of Ghana's e-commerce readiness**

The strategic diagnosis underpinning the national e-commerce strategy distinguishes two types of constraints to be considered for the development and expansion of the e-commerce market: (1) elements that are directly related to e-commerce market and strategy, and (2) what can be defined as the “support functions” of e-commerce.

- The first part of the overview covers the latter by reviewing the prerequisites for e-commerce development. This includes a comprehensive description of the ecosystem, encompassing aspects of the broader Ghanaian economy, including the digital economy. These elements present constraints on e-commerce growth that extend beyond the scope of the e-commerce strategy itself.
- Following this, the strategic diagnosis then focuses on elements that are specific to e-commerce and that can be directly influenced by the e-commerce strategy, operating within the previously defined constraints.

The aim of the strategic diagnosis is hence to define the environment and constraints in which the strategy will operate. It will result in the formulation of strategic orientations, objectives and programs to be put in place to promote the development and widespread use of e-commerce.

While the e-commerce strategy does not attempt to address all the constraints impacting its development, it is essential to consider them when identifying and targeting potential players. In the short term, this means working within existing limitations, while in the medium to long term, progressively alleviating these constraints will expand opportunities for e-commerce development and allow the strategy to adapt over time.

### **2.2 Assessment of the prerequisites for e-commerce development: diagnosis of Ghana's digital ecosystem and e-commerce pillars**

The diagnosis of the digital ecosystem is based on the updated eT Ready of Ghana.



The main results of this evaluation are detailed hereunder by thematic area. The data has been updated to reflect the most recent information available.<sup>2</sup>

### **2.2.1 The prerequisites for e-commerce development: assessing e-commerce readiness and strategy formulation**

The Government of Ghana has launched several programmes to develop ICT and the digital economy. The *Ghana's Digital Agenda* (2018) and the *Ghana Beyond Aid* initiative (2019) have reflected the ambition of the Ghanaian government for Ghanaian digital economy with the announcement by the Ministry of communication and digitalization of the ***“objective to establish Ghana leader in Africa for the digital economy by 2028”***.

These initiatives and programmes share a strong focus towards the digital economy and have facilitated the development of digital services, encompassing infrastructure improvements, the development of the regulatory framework and the deployment of online services. These actions inherently support e-commerce by addressing its foundational requirements. However, the lack of national strategy for e-commerce, reflected at the institutional level, has led to ineffective coordination among all the institutions directly or indirectly involved in different components of e-commerce.

#### **2.2.1.1 National e-commerce strategy vs national strategies for the digital economy: identifying complementarities and avoiding redundancies**

Two governmental programmes and strategies directly linked to digitalization and the digital economy, impacting e-commerce directly or indirectly, are as follows:

- the Ghana digital acceleration program (GDAP) from the Ministry of communication and digitalisation (2022-2027) and;
- the 5-year strategic plan from the National Communication Authority (2024-2028).

These strategies align with the shared objectives for the structural transformation of the economy, particularly emphasizing innovation and recognizing the digital economy as a key growth area. In developing the present strategy, it is important to review these programmes and strategies to avoid

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<sup>2</sup> For an exhaustive presentation of the findings, see the Ghana eTrade readiness assessment (2023) : <https://unctad.org/publication/ghana-etradereadiness-assessment>

redundancies in the recommendations and orientations of the national e-commerce strategy, and to capitalize as much as possible on existing actions to maximize synergies. This review will also help to better to define the scope and direction of the national e-commerce strategy.

#### **2.2.1.1.1 The Ghana digital acceleration program (MOCD)**

The Ghana digital acceleration program was launched in 2022 to address bottlenecks hindering digital transformation, in line with the Government's commitment *"to pursue and harness the potential of ICT to facilitate rapid economic diversification, improve efficiency, productivity and transparency of Government business"*. This initiative seeks to expand broadband access, enhance the efficiency and user experience of selected digital public services, and strengthen the digital innovation ecosystem.

Two out of its five components are specifically as prerequisites for the development of e-commerce:

- Component 1 is focuses on ensuring inclusive and safe digital transformation, allocating 43 million of USD to support the Government's ongoing initiatives. This funding will help build solid foundational blocs for digital transformation through the following strategies:
  - Providing an enabling environment for broadband development and fostering sustainable ICT practices;
  - Assisting the government in enhancing digital connectivity in underserved areas;
  - Supporting government's efforts to implement safeguards for cybersecurity and data protection
- Component 2 is dedicated to a budget of USD 66 million to support the digital transformation of strategic productive sectors. This component aims to enhance and scale Ghana's digital entrepreneurship and innovation ecosystem, drive digitalization in the agricultural sector and support skills development for digital jobs and inclusion.

#### **2.2.1.1.2 5-year strategic program (NCA)**

The five-year strategic plan from the National Communication Authority for the 2024-2028 period has also to be considered, as its primary purpose is to *"position the Authority as a world class regulator to stimulate growth of the telecommunication industry"*.

Ghana's e-commerce strategy will consider developments outlined in this strategic plan, leveraging anticipated improvement in ICT regulations that will support the advancement of digital economy and

e-commerce. During the launch event for this strategic plan, the Minister for Communication and Digitalisation emphasized that it embodies the NCA's commitment to *"fostering communications environment that empowers individuals, promotes economic growth and strengthens the social fabric of our nation"*.

## **2.2.1.2 Governance framework**

### **2.2.1.2.1 Ghana's national steering committee on e-commerce and digital trade**

The National Steering Committee on E-commerce and Digital Trade was officially launched on the 31<sup>st</sup> of August 2023 to facilitate inter-ministerial coordination in identifying, developing, implementing and monitoring of national priorities for e-commerce and digital trade development in Ghana.

The objectives of the committee are to:

- Encourage enhanced national cooperation to address and engage with national, regional, and global policy issues and development challenges in e-commerce and digital trade;
- Facilitate inter-ministerial coordination to support the conduct of Ghana's eT Readiness Assessment, and;
- Provide technical guidance to inform negotiations and identify national priorities concerning the African Continental Free Trade Area Agreement (AfCFTA) Protocol on Digital Trade and the World Trade Organization's (WTO) work-programme on e-commerce.

The national Steering Committee is charged with the following functions:

- Facilitate information sharing: support efforts to mobilize resources, foster public engagement and partnership development on e-commerce and digital trade programmes and/or investments in Ghana;
- Encourage stakeholders' engagement: promote public consultation among all stakeholders in the e-commerce and digital trade ecosystem, ensuring that the needs, requirements and interests of all segments of the population and the economy are inclusively addressed.
- Coordinate inter-ministerial coordination: provide a platform for coordination between Ministries and relevant stakeholders on e-commerce and digital trade with a view to-
  - i. Make technical input on the eT Ready of Ghana and the AfCFTA Protocol on Digital Trade;

- ii. Validate the results of the eT Ready and its accompanying policy recommendations;
  - iii. Share information on ongoing policies/projects/programmes including but not limited to the seven e-commerce policy areas contained in the eT Ready.
  - iv. Support the collection and validation of data on e-commerce and digital trade, including through national surveys.
- Act as liaison between the eT Ready project team and relevant government institutions and/or committees, ensuring that necessary support for project activities is provided.

The National Steering Committee is composed of senior officials from 7 government Institutions, each serving as a permanent member. The members are as follows:

- Ministry of Trade and Industry (MOTI) (Chair)
- Ministry of Communication and Digitalization (MOCD)
- Bank of Ghana
- Ghana Revenue Authority- Customs Services
- Ghana Postal and Courier Services Regulatory Commission
- Ministry of Justice and Attorney General's Department
- Ghana Enterprise Agency

The Secretariat for the National Steering Committee is hosted in the Ministry of Trade and Industry, which also acts as Chair for the Committee.

#### **2.2.1.2.2 Ministries and State agencies in charge of ICTs**

The governance framework for the digital economy and ICT predominantly emphasizes ICT and technology. At the helm is the MOCD, which is in charge for developing reliable and affordable digital infrastructure and services, as well as formulating policies and regulation for the ICT sector. MOCD operates with the support of three key institutions:

- National Information Technology Agency (NITA): established in 2008, NITA is the implementation arm of MOCD, executing various initiatives to enhance digital infrastructure, such as hosting government applications in its data centre and providing connectivity to municipal and district assemblies across the country.
- National Communications Authority (NCA): created in 2003 under the Integrated ICT for Accelerated Development initiative, the NCA functions as an independent regulator responsible for setting standards, issuing licensing and regulating communications. It is also

in charge of promoting the adoption of new technologies and services to improve the quality of ICT and digital services in Ghana.

- Finally, the Ghana Investment Fund for Electronic Communications (GIFEC) is responsible for ensuring universal access to electronic communications in accordance with the Electronic Communications Act of 2008.

## **2.2.2 Overview of prerequisites for e-commerce: ICT infrastructures and services**

### **2.2.2.1 *ICT infrastructure and Internet access***

A robust ICT infrastructure and reliable services are essential prerequisites for the successful development and expansion of e-commerce. The Government of Ghana has made significant efforts and investments to strengthen ICT, leading to substantial achievements. Actions from MOCD through NITA have improved Internet infrastructure and boosted Internet penetration. However, despite these advances, many people still lack meaningful access to the Internet, especially at broadband speeds. The digital divide remains particularly wide in rural areas.

The current state of ICT infrastructure can be summarized as follows:

- In 2023, Internet penetration reached in Ghana 76 per cent, according to from the NCA. This figure includes 2G, 3G and 4G networks. While useful for understanding overall coverage, it is important to note that the breakdown of these technologies is critical for assessing true Internet accessibility. The most recent figure about the 4G penetration rate from NCA was only 10.7 per cent as of late 2021, which is insufficient to expect an expansion of the digital economy and widespread of e-commerce, as these require high data volumes and cannot rely on slower 2G connections.
- Mobile phone usage in Ghana exceeds 130 per cent penetration, and Internet access predominantly relies on mobile networks. Fixed Internet connections remain extremely limited.
- Affordability is a key concern. While the cost of ICT services is becoming more competitive in Ghana compared to most West African countries for small data volumes (Alliance for Affordable Internet), the price for higher data volumes remains a barrier. Indeed, in 2023, data packages of more than 5 or 10 GB represented respectively 5.7 and 11.4 per cent of gross national income. These costs are unaffordable for a large part of the population, posing a significant challenge to achieving universal internet access and expanding the digital economy.

### **2.2.2.2 *Access to electricity***

The attractiveness of the digital industry relies not only on ICT infrastructure but also on access to electricity, a challenge commonly faced by ECOWAS countries, specifically in rural areas.

The electrification strategy of Ghana was initiated through the National Electrification Scheme in 1989, aimed at providing reliable electricity to the entire country by 2020. At the commencement of the Scheme in 1990, only about 20 per cent of the population had access to electricity. Since then, Ghana has made remarkable progress, achieving the highest electricity access rate in sub-Saharan Africa. By 2021, the national average access rate had reached 85.9 per cent, with the goal of universal access.

This development is, however, uneven between urban and rural areas. While 94.7 per cent of the urban population has access to electricity, 26 per cent of the rural population still lacks access, limiting their ability to participate in the digital economy (World Bank 2022).

### **2.2.2.3 Internet access and creation of Community ICT Centres (CIC)**

ICT community centres aimed at expanding Internet access have been increasingly implemented, notably in rural areas.

These centres serve as community resource hubs, offering business services and acting as information centers for individuals and educational institutions, including providing digital training for youth and women. The e-commerce strategy will be able to capitalize on those centres to disseminate information and trainings.

As of early 2024, the Ghana Investment Fund for Electronic Communication reports that 214 Community ICT Centres have been built up, with 181 fully equipped and operational, and 82 connected to the Internet.

## **2.2.3 Overview of prerequisites for e-commerce: trade logistics and trade facilitation**

### **2.2.3.1 Postal services**

E-commerce development in Ghana faces challenges in the delivery services and, logistics sector, particularly due to the weaknesses in the supply chain. These obstacles remain a major barrier to the growth of inclusive e-commerce in the country. Key issues include:

- Limited resources within the national postal services, which does not offer parcel tracking.

- The parcel delivery market is largely dominated by private operators, stepping in to fill the gap left by postal service shortcomings. . In response, the MOCD has taken steps to regulate and monitor courier and delivery services, aligning them with the demands of e-commerce, especially in the context of the AfCFTA (see hereafter the paragraph AfCFTA and Ghana’s strategic goal).
- International postal exchanges also suffer from the lack of collaboration between postal and customs services. Further collaboration between those entities is essential to improve the efficiency of customs clearance for international parcels.

### **2.2.3.2 Addressing system**

Ghana has made notable progress in the area of trade logistics with the introduction of a digital addressing system. The National Digital Property Addressing System, along with the ongoing development of GhanaPostGPS, aims to develop a comprehensive framework that supports e-commerce (box 1).

National consultations have however revealed mixed feedback, suggesting the need for a thorough audit of the system’s functionality across various aspects, such as technical performance, accessibility, and user convenience, to optimize its effectiveness. Addressing remains a challenge in some parts of the country, notably in rural areas.

#### **Box 1: GhanaPostGPS**

GhanaPostGPS is Ghana's official digital property addressing system designed to cover every inch of the country, and ensure that all locations in Ghana are accurately addressed. With GhanaPostGPS, each place is assigned a unique digital address.

The system divides the country into 5m x 5m grids , giving very piece of land and property a permanent digital address.

For example, the address **AK-039-5028** belongs to the Kumasi Main Post Office. In a deconstructed form, **AK-039** is the postal code for the area, with “**A**” referring to the region of the location (Ashanti Region), and “**K**” indicating the district (Kumasi District). The “**5028**” identifies the specific location within the postal code. Together, these components form a unique address for precise identification and navigation.

Source: GhanaPostGPS, available at [www.ghanapostgps.com](http://www.ghanapostgps.com).



### **2.2.3.3 Trade facilitation**

The Government of Ghana's current strategy for economic transformation focuses on two key pillars: enhancing trade facilitation and improving the business environment. These efforts aim to foster inclusive and sustainable growth.

Central to this strategy, and aligned with the growing demands of e-commerce development, several initiatives have been launched in recent years to promote both postal development and cross-border trade facilitation;

- Regarding trade facilitation, Ghana continues to advance its implementation of the Trade Facilitation Agreement and ranks first among ECOWAS countries in the customs category of the Logistic Performance Index (LPI). In 2023, Ghana also ratified the African Union Convention on Cross-Border Cooperation, further strengthening regional integration efforts.
- To enhance cross-border trade, Ghana has developed the Ghana Single Window, initially in 2002 and continuously updated. This platform facilitates seamless information exchange between the logistics providers, traders and public administration, streamlining trade processes.

### **2.2.3.4 AfCFTA and Ghana's strategic goal**

The Government of Ghana set the strategic goal to become a gateway to the AfCFTA, following the ratification of the agreement in July 2022.

In alignment with this, the MOCD has issued specific directives to monitor delivery services of e-commerce operators. Indeed, persistent non-compliance with the legal requirements in Ghana's digital business sector, specifically within courier and delivery services, could undermine this national goal. To address this, the MOCD introduced a new directive in November 2023 to strengthen the enforcement of the Postal & Courier Services Regulatory Commission (PCSRC) Act. Box 2 highlights the specific compliance guidelines set forth by the MOCD to courier and delivery services. The responsibility for verifying the registration status of drivers, couriers and agents now lies with Digital Services and Business Operators (DSBOs) and Delivery Service Providers (DSPs). They are required to ensure that all parties possess valid PCSRC e-certificates and AfCFTA Numbers before conducting any business. DSBOs and DSPs must also enable consumers to verify the registration status of couriers and delivery agents and provide platforms to filing complaints and rating services online, using PCSRC e-certificate IDs.

**Box 2: Compliance guidelines to courier and delivery services from MOCD**

Digital Services and Business Operators (DSBOs) must strictly comply with the following compliance guidelines:

1. **Registration requirement:** It is illegal to operate a digital platform for physical goods delivery in Ghana without registering with the Postal & Courier Services Regulatory Commission (PCSRC). All courier and delivery service providers (DSPs) must register with the PCSRC which has streamlined the registration process for DSPs on the AfCFTA Hub.
2. **Registration process:** DSPs should visit [www.afcfta.pcsrc.gov.gh](http://www.afcfta.pcsrc.gov.gh) and follow the prompts for registering and obtaining the PCSRC e-certificate and an AfCFTA Number.
3. **Verification of e-certificates:** DSBOs operating in Ghana must verify the PCSRC e-certificates for DSPs on the AfCFTA Hub by the end of November 2023.
4. **Cease onboarding non-registered DSPs:** Starting December 19th, 2023, DSBOs must cease onboarding or working with new DSPs that have not registered with the PCSRC and obtained the requisite e-certificate.
5. **Mandatory registration:** It is mandatory for all DSBOs, including e-commerce, ride-sharing courier operators, and e-logistics platforms to register on the PCSRC portal.
6. **Port logistics registration:** Logistics operators connected to ports must also register, with assistance from the Ghana Revenue Authority.
7. **Deadline for existing platforms:** DSBOs and DSPs currently on existing platforms have until January 24th, 2024, to obtain PCSRC e-certificates for all affiliated drivers, couriers, and delivery agents active on their networks.

Source: MOCD Directive HA28/122/02, November the 6<sup>th</sup>, 2023

**2.2.4 Overview of prerequisites for e-commerce: payment solutions**

Ghana has made substantial progress in financial inclusion, following notably the Payment System Strategy (Go Digital) initiated by the Bank of Ghana for 2019–2024 and the introduction of full interoperability between mobile money providers and banks introduced by the Bank of Ghana in December 2018.

This has contributed to a remarkable increase in mobile money usage across the country, mirroring trends seen throughout Africa. As a result, the adoption of digital payment solutions has surged among the population. The share of Ghanaian adults with formal financial accounts increased to 72 per cent in 2021. The active mobile money account ownership penetration rate is now 89 per cent, according to the most recent Financial Access Survey conducted by the International Monetary Fund in 2022.

The dematerialization of payments remains however limited today in Ghana, despite advancements in mobile money and increased banking penetration rate. Key challenges include:

- Cash dominance: Cash largely remains the primary payment method, especially for e-commerce transactions, often in the form of “cash on delivery”. This reliance creates security risks associated with cash transport and presents challenges for merchants, who may encounter issues such as consumers failing to pick up goods or attempting to renegotiate the amount of the transaction upon delivery.
- Mobile money usage: While mobile money services exist, they are predominantly used for deposits and withdrawals rather than payments. This restricts the full potential of mobile wallets for everyday transactions.;
- High transaction costs: Transferring mobile money from one account to another and making withdrawals are expensive, particularly for a significant portion of the population with limited purchasing power, further hindering widespread adoption;
- Trust in digital payment: Confidence with digitalized payment solutions remain an issue as reflected by various stakeholders during the national consultations;
- Limited card penetration: The penetration rate of debit and credit cards remains limited with only 29 per cent of the adult population possessing them (IMF Financial Access Survey, 2022). This contributes to the underutilization of online payments via credit cards.

### **2.2.5 Overview of prerequisites for e-commerce: legal and regulatory framework**

The legal and regulatory framework governing both traditional trade and e-commerce is established primarily based on the ECOWAS regulatory framework. This foundation is essential to strengthen consumer protection and foster user confidence in e-commerce, and to reassure the whole e-commerce supply chain.

However, the following elements should be addressed:

- The legal and regulatory framework should be updated to reflect global best practices;
- Current laws do not seem to be strictly enforced, and many national actors remain unaware of their existence;
- The capacities of the judiciary and law enforcement agencies need to be strengthened;
- The institutional framework for consumer protection, whether in ICT or online commerce in general, is poorly structured and lacks visibility;

- Finally, the legal framework also needs to be expanded to cover the business-to-business sector adequately.

Relevant laws include:

#### **2.2.5.1 *Electronic communications:***

- The National Information Technology Act (Act 771, 2008) established the National Information Technology Agency to regulate ICT.
- The National Communications Act (2008) (Act 769, reviewing the existing NCA, 1996) established the National Communications Authority.
- The Electronic Communications Amendment Act (775, 2008) regulates electronic communications and broadcasting, including the use of the electronic-magnetic spectrum.
- The Electronic Communications Regulations (2011) outlines general principles applicable to the electronic communications industry, which govern the Authority, operators of electronic communications networks and providers of electronic communications services.
- The Electronic Communications Regulations (2016) provides the Rules of Procedure of the Electronic Communications Tribunal.

#### **2.2.5.2 *Electronic transactions:***

- The Electronic Transactions Act (Act 772, 2008), amended by the Electronic Transactions Amendment Act (Act 838, 2012) provides the regulation of electronic communications and related transactions. Notably, section 10 specifies the conditions under which digital signatures are presumed to be authentic.
- Furthermore, this Act implements the UNCITRAL Model Law on Electronic Commerce (1996), and the UNCITRAL Model Law on Electronic Signatures (2001), and incorporates key provisions of the United Nations Convention on the Use of Electronic Communications in International Contracts (2008).

#### **2.2.5.3 *Data protection:***

- The Data Protection Act (Act 843, 2012) addresses various issues and challenges discussed during the national consultations, particularly concerning the degree of implementation of the Act, as well as the requisite skills for the officers in charge for monitoring compliance.

#### **2.2.5.4 *Cybercrime and cybersecurity:***

- At the level of the African Union, the Convention on Cyber Security and Personal Data Protection (Malabo Convention) of 27 June 2014 is the reference text for electronic commerce

and digital economy. This Convention governs electronic transactions, including electronic signatures, personal data protection, cybersecurity, and the fight against cybercrime.

- The Budapest Convention was ratified in 2018 and entered into force in 2019.
- The Cyber Security Act 2020 (Act 1038) of Ghana created the Cyber Security Authority (CSA), which is tasked with regulating cybersecurity activities, promoting the cybersecurity development, and ensuring the overall protection of citizens.

#### **2.2.5.5 Consumer protection:**

- The Government of Ghana, through MOTI, has initiated national consultations aimed at developing a comprehensive consumer protection policy as part of the broader Ghana trade policy. This initiative goes beyond addressing issues related solely to e-commerce and ICT. One of the key shortcomings identified in the current framework is the lack of accessible and cost-effective mechanisms for consumer redress, which are essential for safeguarding consumer rights.

#### **2.2.6 Overview of prerequisites for e-commerce: development of digital skills**

The supply of training courses and diplomas for digital skills and e-commerce has increased in recent years. A series of programmes and initiatives have been implemented to help girls and women embrace ICT careers and adhere to new technology through skills enhancement, trainings and mentoring. Stakeholder's consultations highlighted, similarly to education programmes, the pressing need for improved communication regarding these initiatives.

However, national consultations evidenced a significant mismatch between the training offered by universities and technical training schools and the actual needs expressed by digital market players.

To address this gap, a digital skills development plan needs to be integrated into the national e-commerce strategy. This plan would ensure that training offering align with the needs of companies and help structure the ecosystem to support incubators and technology start-ups.

These programmes must however recognize two critical factors: (1) access to university education remains quite limited, resulting in a low participation rate in technological university programmes, which constituted 18.7 per cent of tertiary schooling in 2021, according to the World Bank World Development Indicators (2022) ; (2) E-commerce encompasses more than just technology and innovations, necessitating programmes that address a broader range of skills and knowledge.

#### **2.2.7 Overview of prerequisites for e-commerce: access to financing**

Technology start-ups in the digital economy generally often struggle to secure direct financing from banks, which typically require collateral requirements that these companies cannot meet. Consequently, they are forced to rely on their own funds. Moreover, the deficit of entrepreneurial skills in project and financial management, hampers access to financing for small entrepreneurs, beyond just tech start-ups. This limitation is especially evident when presenting financing plans to financial institutions or potential industrial partners.

Moreover, commercial banks in Ghana exhibit particularly low loans-to-deposit ratios, significantly restricting their role in financing of the economy. As a result, technology start-ups and small entrepreneurs face heightened challenges in securing funding. Credit to the private sector consistently falls short of expectations, reflecting the structural characteristics of the Ghanaian economy. Outstanding loans from commercial banks remain substantially lower than the deposits they receive, and this gap has widened over time. The deposits-to-loans ratio has henceforth been rising from 1.5 to 2.3 over the period 2017 and 2021, indicating that loans allocated to the private sector represent less than half of the deposits. This situation is exacerbated by the lack of robust credit risk mitigation tools and a contract enforcement framework capable of mitigating the risks of strategic defaults by borrowers.

## **2.3 E-commerce diagnosis in Ghana : strategic findings**

The assessment of Ghana's e-commerce readiness, informed by UNCTAD's 2023 update, has identified a number of strategic challenges that will shape the country's national e-commerce strategy.

### **2.3.1 Strategic challenge 1- E-commerce is constrained by the transversality of its environment: the strategy must capitalize on existing related strategies to pool efforts and focus on the intrinsic aspects of e-commerce**

The review of the contextual framework has evidenced the transversal nature of e-commerce and its constraints, with issues related notably to digital infrastructures, logistics, legal framework, digital skills. This strong transversality of the constraints on e-commerce development has several immediate implications for Ghanaian national e-commerce strategy:

- The contours of the e-commerce strategy need to be precisely defined, distinguishing what it encompasses and what it does not;
- The constraints linked to the intrinsic aspects of e-commerce must be distinguished from those linked to its support functions;
- The strategy must leverage existing support function strategies, while taking into account the transversal nature of e-commerce and its unique requirements;
- The e-commerce strategy must be comprehensive and ambitious, yet pragmatic and realistic, focusing on the essential aspects of e-commerce while integrating and collaborating with existing “partner strategies”.

The e-commerce strategy should not serve as a one-size-fits-all approach for all foundational elements. Each of the seven pillars has distinct objectives that extend beyond e-commerce. Consequently, the e-commerce strategy cannot dictate its agenda and objectives to areas such as digital ICT infrastructure, delivery and postal services, rail and road infrastructure, online payments, customs reform, regional trade integration, taxation, all of which encompasses broader considerations than e-commerce alone.

It is essential to conduct on a regular basis detailed and rigorous monitoring of ongoing actions aimed at progressively alleviating these constraints, ultimately benefiting the e-commerce market as a whole.

A number of these actions were identified during the strategic diagnosis phase, notably regarding the development of digital infrastructure and the regulatory framework, which are integral to the Ghana digital acceleration program from the MOCD and the 5 year strategic program from the NCA.

### **2.3.2 Strategic challenge 2: The lack of comprehensive understanding of the e-commerce market requires a precise delineation of the e-commerce strategy's scope and objectives**

The current understanding of the e-commerce market is insufficient, particularly regarding key e-commerce actors, relevant statistics, and the dynamics of goods and services involved in transactions. Existing data is primarily limited to financial flows reported by Bank of Ghana, which pertain to mobile money transfers, as well as metrics on Internet connectivity such as subscribers counts or coverage. However, there is a significant gap in reliable information to track the nature of goods bought or sold online during e-commerce operations via these Internet connections or mobile money transactions. This lack of knowledge of the e-commerce market presents several challenges that must be addressed as part of the e-commerce strategy, which aims to foster trust, create incentives, and promote inclusive e-commerce development, all while broadening the tax base. Key questions arise from this knowledge gap:

- How can we generate trust and attract potential players in a market where we lack clarity on financial flows, revenues, and stakeholders?
- How can we develop and implement incentives to support inclusivity for players in a market that remains largely undefined?
- How can we effectively expand the tax base if we are unable to accurately identify or account for the transactions that form the basis for taxation?

The current lack of understanding highlights the need for a clear, commonly accepted definition of e-commerce. A review of e-commerce literature reveals a consensus on the importance of establishing this clarity.

The definition used for the elaboration of the e-commerce strategy relies on Ghanaian Electronic Transactions Act 772 (2008) amended by the Electronic Transactions Amendment Act 838 (2012). This legislation regulates electronic communications and related transactions, defining e-commerce transactions as those validated through automated dedicated interfaces. This definition aligns with the standards set by the Organisation for Economic Cooperation and Development (OECD), which are



commonly recognized at the international level, including within developing countries and frameworks like the ECOWAS e-commerce strategy.<sup>3</sup>

In addition, the Electronic Transactions Act 772 (2008), along with its amendments outlines specific requirements that ensure the integrity and security of electronic transactions, which are critical for payment and delivery processes:

- *Section 10* stipulates the conditions under which digital signatures are presumed authentic, thereby validating the electronic transactions.
- *Sections 47 to 49* specify compliance standards for e-commerce sector in view of consumer protection, notably regarding the information the suppliers of goods and services shall make available to the consumers on the e-platform where the goods and services are offered. This includes return policy, payment security, and privacy policy as regards payment, payment information and personal information.
- *Directive HA28/122/02*, issued by the MOCD on November the 6<sup>th</sup>, 2023, specifies that Ghanaian e-commerce operators and their courier services must register with the PCSRC by December 2023, emphasizing that *“no new goods delivery and courier service provider can register with any digital platform or delivery service without a valid PSCRC e-certificate”*.

Box 3 provides details on the definition of e-commerce in the Ghanaian context.

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<sup>3</sup> The OECD defines e-commerce as *“the sale or purchase of goods or services over computer networks by methods specifically designed to receive or place orders. The goods or services are ordered by these methods, but payment and final delivery of the goods or services do not have to be made online. An e-commerce transaction can be carried out between companies, households, individuals, public administrations and other public or private organizations. This definition excludes sales or purchases made physically or without the use of the means offered by digital networks (Web pages, Extranets, Electronic Data Interchange [EDI] networks); for example, orders made by telephone and via hand-typed e-mails are excluded.”*

### Box 3- Definition and constitutional elements of e-commerce in Ghana

By combining the principles of the OECD definition, with payment and delivery aspects, the government of Ghana underscores the importance of secure transactions and reliable delivery systems to foster consumer confidence, which is critical for the growth of e-commerce. This approach provides a more comprehensive and actionable framework for e-commerce, ensuring that all elements of the e-commerce chain function cohesively to create a secure, efficient, and thriving digital economy. Ultimately, it supports the overarching objectives of traceability, visibility, trust and taxation essential for the development of e-commerce in Ghana.

#### 1. Alignment with the OECD's standard definition of e-commerce: e-commerce transactions are based on automated acts of buying and selling

The core of e-commerce transaction lies in their reliance on automated processes for buying and selling. Such transactions typically occurred via platforms utilize dedicated IT systems or applications for automatic, computerized order validation. The automation of the purchasing act is central to this definition.

- ✓ M-commerce (mobile) or s-commerce (social network), which reflect informal commerce and involve exchanges via messaging services, do not constitute e-commerce transactions due to the absence of automated purchasing. Similarly, transactions conducted by e-mail or telephone call are excluded from this definition as they do not comply with the Ghanaian Electronic transactions Act 772 and amendments. However, some platforms, like Facebook and WeChat, offer automated processes and are considered integral to e-commerce.
- ✓ Sales and purchases carried out physically or outside digital networks, such as orders made by telephone, messaging service or hand-typed e-mail, fall outside the scope of e-commerce.
- ✓ The exclusion of informal online commerce from the definition aligns with the goal of securing e-commerce transactions. This formalization of online transactions is also consistent with the Directive HA28/122/02.
- ✓ Social networks
- ✓ play an important role in the context of e-commerce landscape, including formal e-commerce, notably through site rating systems and user feedback, which enhance the visibility and trustworthiness of different sites and platforms.

#### 2. Going beyond the standard OECD definition to take account electronic payments and delivery services

2.1- The role of electronic payments needs to be included in the Ghanaian context in order to foster confidence and take-up of e-commerce.

- ✓ The OECD definition of e-commerce transactions does not require online payment for transactions to be classified as e-commerce. Payments can occur offline and still be considered as such. Although not a prerequisite, electronic payments play a key role in facilitating domestic e-commerce transactions and are often necessary for cross-border trade.

2.2- The role of delivery services is emphasized in the Ghanaian MOCD Directive HA28/122/02 as a key factor to support the development and generalization of e-commerce.

- ✓ International experience shows that reliable and secure electronic payments systems are essential for increasing inclusion, confidence, and the adoption of e-commerce.
- ✓ Delivery services, though not mentioned in the OECD definition, are crucial for online shoppers as they form part of the services “consumed” in the e-commerce transactions process.
- ✓ The experience of the most advanced countries in e-commerce development (USA, European Union, China, Japan, South Korea) demonstrates the importance of reliable and flexible delivery services for the successful deployment of e-commerce. These services have made a major contribution to the success of e-commerce in these countries, while fostering customer loyalty.
- ✓ Promoting delivery services as part of an e-commerce strategy aligns with global best practices, particularly in developing countries. Ghana’s national e-commerce strategy will incorporate the development, support and promotion of dedicated delivery services, which not only support e-commerce but also create employment opportunities in the e-services sector.

### 2.3.3 Strategic challenge 3: E-commerce development needs an industrial vision as e-commerce is business before it is technology

A review of the development axes underlying the promotion and generalization of e-commerce reveals a misalignment between the vision for e-commerce and the current structure of the economy.

On one hand, the typical vision beyond the development of the “digital economy” and e-commerce is to boost economic activity. This involves strengthening the productive sector, creating employment, and promoting social cohesion. Some of the key challenges and objectives mentioned during the national consultations regarding the national e-commerce strategy include:

- Strengthening the competitiveness of Ghanaian companies and expanding their presence in national, regional and international markets.
- Broadening the tax base.
- Creating jobs, particularly for women and young people.
- Enhancing sustainable and inclusive economic growth driven by “industrial” and productive economic activity.
- Diversifying the economic activity.

However, the bulk of Ghanaian exports are dominated by raw materials - largely unprocessed products that are not typically suited for trade via digital e-commerce platforms. According to the *Ghana Statistical Service*, gold (GH¢84.4 billion), mineral fuels and oils (GH¢44.6 billion), and cocoa beans and products (GH¢20.9 billion) accounted for 80.6 percent of all exports in 2023 (80.5 percent in 2022).<sup>4</sup>

It is henceforth important to define and plan the types of the goods, products, or services that align with the national strategy of e-commerce. Support must be tailored to specific sectors whose strategic development fits within this framework.

As previously discussed, while most of the current initiatives and strategies related to the digital economy have a technological focus, reflecting the current structural constraints that naturally condition its expansion of e-commerce, it is essential to reiterate that **e-commerce is fundamentally a commercial and business endeavour, not merely a technological one**. The strategy must propose actions that define clear strategic sectoral orientations and a dedicated industrial vision in support the

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<sup>4</sup> <https://statsghana.gov.gh/gssmain/fileUpload/Trade/Ghana%202023%20Trade%20Report.pdf>

development of e-commerce<sup>5</sup>. This approach will better align with the national goals related to employment, economic growth and social cohesion or inclusion.

#### **2.3.4 Strategic challenge 4: Promoting confidence in e-commerce requires strengthening both the physical and virtual dimensions**

The specificity of e-commerce lies in the fact that, by definition, the transaction is carried out remotely: the buyer or the seller cannot observe either the product or the other party. This implies an increased need for security to ensure both parties' trust. It is essential to address the security of both the "virtual" and the "physical" elements of e-commerce transactions.

Strengthening trust in the "virtual part" of the transaction involves securing key elements such as:

- Ensuring accessibility and reliability of Internet connections;
- Enhancing the credibility and transparency of merchant sites and e-commerce platforms;
- Safeguarding dematerialized payment systems.

Some of these aspects are largely considered in both Ghana digital acceleration program (GDAP) from the Ministry of communication and digitalisation (2022-2027) and the 5-year strategic plan from the National Communication Authority (2024-2028), notably regarding digital infrastructure and accessibility as well as regulation, and data protection.

The importance of strengthening the "physical part" of e-commerce transaction is often underemphasized, despite being critical in building trust among potential users. Key components include:

- the quality of the products themselves;
- the reliability of the logistics chain, encompassing the entire process from the pick-up or storage of the goods to transport and delivery to the consumer;
- ensuring robust consumer protection.

While some of these aspects are partially been addressed through on-going initiatives, such as regulatory measures for delivery services (refer to the Directive from the MOCD HA28/122/02) and the review of the consumer protection policies, there is a need to carefully monitor and coordinate

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<sup>5</sup> As discussed later in the document, this industrial vision for e-commerce is clearly not in "competition" with Ghana's overall industrial and export strategy.

these efforts to prevent duplications and inefficiencies. This strategy will further strengthen other essential areas to enhance trust in e-commerce transactions.

### **2.3.5 Strategic challenge 5: Prioritizing inclusion for the most vulnerable**

Developing inclusive e-commerce is hindered by inequalities in access observed across all e-commerce pillars, mirroring the socio-economic inequalities faced by the most economically vulnerable populations. These access gaps manifest in several areas, including:

- Uneven access to connectivity, particularly evident in the “double digital divide” between urban and rural areas, and between wealthy and disadvantaged populations;
- Uneven degree of formalization of economic activities, leaving part of the population unprotected. This affects both producers and supply chain actors (in terms of social protection), and consumer protection (in terms of buyer protections). In all cases, informal transactions, by their nature, are unregulated, placing both counterparts outside the regulatory and the tax frameworks;
- Unequal access to financial inclusion;
- Uneven development of digital skills, exacerbated by literacy challenges.

These disparities not only raise critical questions about opportunities and social inclusiveness, but also highlight inefficiencies in the development of the e-commerce market by excluding some of potential actors.

The national e-commerce strategy will prioritize support for economically or digitally vulnerable populations, in line with broader social inclusion objectives. This will specifically target the following groups:

- People living in rural areas
- -Women and youth
- - Persons with disabilities

Special attention will be paid to informal sector players, including unregistered operators, many of whom belong to these vulnerable groups.

## **2.4 E-commerce SWOT Analysis**

A SWOT analysis enables us to summarize the strengths, weaknesses, opportunities and threats of e-commerce, while highlighting key challenges. This process provides a clear foundation for shaping strategic orientations to pursue.

**Table 2- strategic diagnosis- SWOT analysis**

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"> <li>• A stable economic, political and social environment conducive to growth;</li> <li>• Strong political will backed by the President of the Republic and the Government;</li> <li>• An institutional framework with programs and initiatives that extend beyond e-commerce alone, fostering broader technological and technical advancements.;</li> <li>• An established regulatory framework that supports e-commerce;</li> <li>• Widespread adoption of digital technology across all sectors of economic activity, including transport, crafts, hospitality, and public administration;</li> <li>• Ongoing development of several sectoral strategies to reinforce the prerequisites for e-commerce development;</li> <li>• Development of electronic payment such as e-money;</li> <li>• An emerging e-commerce ecosystem driven by growing demand from the various players in the Ghanaian economy.</li> </ul>	<ul style="list-style-type: none"> <li>• Weaknesses of certain prerequisites for the development of e-commerce, such as limited access to electricity and broadband Internet, address and delivery logistics issues, high levels of illiteracy, including digital illiteracy.</li> <li>• Lack of collaboration among government structures involved in e-commerce;</li> <li>• Lack of a structured platform public-private dialogue;</li> <li>• Absence of a financing mechanism for SMEs in the e-commerce sector;</li> <li>• No specialized e-commerce enforcement agencies;</li> <li>• Misalignment of programs concerning the technological component underpinning the development of e-commerce and the business component. E-commerce is not a computer application to be developed, but a means of exchanging products. Engaging the various players in the production and distribution chain, including consumers, is vital for holistic development;</li> <li>• Lack of information sharing and pooling among all the digital initiatives likely to strengthen the foundations for e-commerce development;</li> <li>• Limited application of the regulatory framework, which also needs to be updated. This involves training for the judiciary and aligning regulations with current technological realities, such as the effective implementation and operationalization of a Public Key Infrastructure (PKI) for the certification of electronic signatures;</li> <li>• The relatively small size of the Ghanaian market poses additional challenges for scaling e-commerce initiatives and attracting investment.</li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• Development of economic infrastructures, including digital ones;</li> </ul>	<ul style="list-style-type: none"> <li>• Rising of cybercrime ;</li> <li>• Increased external competition due to market opening ;</li> <li>• Fiscal pressures;</li> </ul>

<ul style="list-style-type: none"> <li>• Operationalization of the AfCFTA to facilitate trade and economic integration;</li> <li>• Development of social networks;</li> <li>• Young, digitally connected population;</li> <li>• Expand the market opportunities for Ghanaian producers, both locally and across borders, and showcase Ghanaian products to create direct and indirect job opportunities.</li> <li>• Create jobs in e-commerce-related industries, such as delivery services and logistics.</li> <li>• Enable Ghanaian consumers to access higher-quality products with greater transparency on prices and the manufacturing processes.</li> <li>• Strengthen women's entrepreneurial initiatives in local crafts and digital services.</li> <li>• Capitalize on initiatives and opportunities provided by ECOWAS and AfCFTA to boost regional collaboration and development.</li> </ul>	<ul style="list-style-type: none"> <li>• Scattering of resources with a multiplication of projects without a cohesive vision;</li> <li>• Widening the digital divide between those who are connected and those who are not (urban vs. rural);</li> <li>• Falling behind countries that have more rapidly put in place the prerequisites and adopted best practices for developing e-commerce.</li> </ul>
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### 3 STRATEGIC ORIENTATIONS FOR E-COMMERCE STRATEGY OF GHANA

In view of the strategic diagnosis and the unique context of Ghana, it seems essential to establish a national strategy aimed at fulfilling the expectations of the Government of Ghana and national stakeholders regarding the development and promotion of e-commerce.

To this end, the e-commerce strategy of Ghana outlines key challenges, a clear vision and strategic objectives that will be further broken down into actionable goals and measures.

#### 3.1 Challenges and drivers of the national e-commerce strategy

The primary challenges and drivers underpinning the development of the national e-commerce strategy are as follows <sup>6</sup> :

- **Optimizing the institutional framework:** streamline existing institutional structures to foster synergy in government efforts and effective management of e-commerce development;
- **Enhancing competitiveness:** boost the competitiveness of companies operating in the e-commerce sector and stimulate export activities;
- **Developing an Inclusive strategy:** elaborate an inclusive strategy that takes into account the concerns of all stakeholders, with a particular focus on capacity building;
- **Expanding the tax base:** broaden the tax base to increase government revenues; and,
- **Improving monitoring mechanisms:** strengthen the oversight of e-commerce development to ensure progress and effectiveness.

#### 3.2 Vision of the national e-commerce strategy

The vision of this strategy is “to position e-commerce a powerful driver of wealth creation for the Ghanaian economy”.

It reflects the Government of Ghana’s commitment to leveraging e-commerce as a catalyst for economic and social development, fostering strong, sustained, sustainable and inclusive economic growth for the entire population.

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<sup>6</sup> Those challenges as well as the following vision emerged from national consultations organised the 27th and 28th of June 2024 in Accra. The consultations involved a wide range of stakeholders from both the public and private sectors.

### 3.3 The principles of the national e-commerce strategy

The national e-commerce strategy is built on the following key principles to achieve its objectives;

- **Shared responsibility:** all e-commerce users, both private and public, must implement best practices to safeguard their information and guarantee resilience in the e-commerce ecosystem.
- **Employment and economic development:** as the Ghanaian government wishes to capitalize on the development of e-commerce to promote growth and employment, the national e-commerce strategy is a development factor.
- **Rule of law and respect for human rights:** the national e-commerce strategy will be implemented in accordance with Ghana's existing legal framework, and with international conventions ratified by the government. It emphasizes respect for human rights and fundamental freedoms, with particular attention given to data privacy and the protection of vulnerable populations online.
- **Cooperation and collaboration:** the government is committed to working collaboratively with national and international stakeholders in the e-commerce sector to ensure effective implementation and governance.
- **Continuous improvement:** the national e-commerce strategy adopts a continuous improvement model to safeguard infrastructure, services, data, and citizens in response to evolving risks in the e-commerce space.
- **Risk-based approach:** a risk-based methodology will guide the development and monitoring of e-commerce initiatives. The government expects all stakeholders, particularly public organizations and state-critical organizations, to adopt this risk-based approach using its established risk analysis framework.

These key principles are fundamental to the successful implementation of the national e-commerce strategy.

#### 4 STRATEGIC ORIENTATIONS AND STRATEGIC GOALS

Based on this vision, and following the challenges identified through the strategic diagnosis, the national e-commerce strategy of Ghana has been structured around four strategic orientations, each with its own set of objectives.

- **Orientation 1-** Enhancing institutional monitoring and developing a clear industrial vision for e-commerce growth
- **Orientation 2-** Building trust to promote greater adoption of e-commerce
- **Orientation 3-** Supporting and monitoring the e-commerce sector to foster a thriving e-commerce ecosystem
- **Orientation 4-** Adapting the strategic framework to ensure e-commerce is accessible and inclusive for all segments of society

The four strategic orientations are broken down into fifteen specific objectives and fifty-six measures, all designed to respond to the issues described above, resulting from the strategic diagnosis. Table 6 summarizes the strategic orientations along with their corresponding objectives.

The subsequent sections detail the specific measures for each of the strategic goals objectives under the broader strategic orientations.

**Table 3- Strategic orientations and strategic goals for the national e-commerce strategy of Ghana**

Strategic orientations	Strategic goals
<b>Orientation 1- Institutional strengthening:</b> <i>Enhancing institutional monitoring and developing a clear industrial vision for e-commerce growth</i>	<ul style="list-style-type: none"> <li>• Strategic goal 1.1 : Establish a dedicated e-commerce Directorate at the core of the e-commerce strategy</li> <li>• Strategic goal 1.2 : Formulate an industrial vision for e-commerce growth that aligns with economic development objectives</li> <li>• Strategic goal 1.3 : Monitor the strategies of partner sectors and support functions to ensure alignment and coordination.</li> </ul>
<b>Orientation 2- Building trust</b> <i>Building trust to boost e-commerce adoption</i>	<ul style="list-style-type: none"> <li>• Strategic goal 2.1 : Generate trust in e-commerce transactions processes</li> <li>• Strategic goal 2.2 : Establish trust in e-commerce products</li> <li>• Strategic goal 2.3 : Strengthen trust in the e-commerce supply chain and its stakeholders</li> <li>• Strategic goal 2.4 : Review and promote the legal and regulatory framework</li> </ul>
<b>Orientation 3- Supporting and monitoring</b> <i>Supporting and monitoring e-commerce market actors</i>	<ul style="list-style-type: none"> <li>• Strategic goal 3.1 : Conduct statistical supervision of the e-commerce market</li> <li>• Strategic goal 3.2 : Strengthen the business component of e-commerce</li> <li>• Strategic goal 3.3 : Provide an entry point for players interested in e-commerce</li> <li>• Strategic goal 3.4 : Support and accompany e-commerce market players</li> </ul>
<b>Orientation 4- Guaranteeing inclusion</b> <i>Adapting the strategic framework to make e-commerce inclusive</i>	<ul style="list-style-type: none"> <li>• Strategic goal 4.1 : Encourage and support the development of digital skills</li> <li>• Strategic goal 4.2 : Enhance support for players in the rural sector, particularly regarding connectivity</li> <li>• Strategic goal 4.3 : Provide assistance and resources to populations deemed with specific needs, including women, young people, people with disabilities</li> <li>• Strategic goal 4.4 : Facilitate the transition of informal sector players towards formalization</li> </ul>

#### **4.1 Strategic orientation 1: Enhancing institutional monitoring and developing a clear industrial vision for e-commerce growth**

This first orientation aims to strengthen the efforts of the Ministry of Trade and Industry to foster an industrial vision at the heart of the development of e-commerce. As previously mentioned, this industrial vision for e-commerce is not intended to compete with Ghana's overall industrial and export strategy; rather, it is specifically focused on supporting stakeholders in the e-commerce market.

##### **4.1.1 Specific goal 1.1: Establish a dedicated e-commerce Directorate at the core of the e-commerce strategy**

- Establish an e-commerce organ to serve as the institutional entry point for any initiative, information, and resources related to e-commerce. As such, it is essential to have direct access to relevant information on current projects and initiatives directly or indirectly impacting e-commerce.
- Monitor the progress of the digital strategies implemented by other sectoral ministries that relate to e-commerce.
- Identify, centralize and disseminate information and initiatives related to e-commerce at the regional and international levels (including WAEMU, ECOWAS, the AU). The primary role of that e-commerce organ is to provide visibility on e-commerce players and operations, centralize current information and initiatives, and coordinate actions aimed at the development and promotion of e-commerce.
- Represent Ghana in regional and international e-commerce negotiations.

The purpose of this organ extends beyond the timeframe of the national e-commerce strategy.

##### **4.1.2 Specific goal 1.2: Formulate an industrial vision for e-commerce growth that aligns with economic development objectives**

- Coordinate the efforts of the e-commerce organ with initiatives of other departments in MOTI (MSMEs, foreign trade, etc.) to pinpoint to pinpoint areas of synergy and mutual benefit.
- Develop an industrial sectoral strategy specific to e-commerce. This strategy will complement Ghana's national industrial strategy at macro-economic level, focusing specifically on

structuring, planning and supporting the e-commerce business component and counterparts in conjunction with existing technical/technological programs.

- Identify and prioritize goods/services and producers that are central to the e-commerce development strategy, ensuring alignment with broader goals for growth and innovation in the sector.

#### **4.1.3 Strategic goal 1.3: Monitor the strategies of partner sectors and support functions to ensure alignment and coordination**

- Produce a comprehensive inventory of e-commerce-related elements in the digital strategies of other sectoral Ministries.
- Draw up and maintain a centralized dashboard to track partner strategies and initiatives undertaken by technical ministries and state agencies (e.g. centralize and monitor the various public initiatives related to marketplaces and PKI development).
- Provide a peripheral overview of e-commerce development opportunities in relation to progress of the various national strategies associated with e-commerce. As e-commerce growth hinges on the advancement of the several related programs identified in the diagnosis, it is essential to continuously monitor all actions tied to technology that can benefit e-commerce. This is even more important as these programs often have broader objectives beyond e-commerce and may not be included in the specific e-commerce agenda.

## **4.2 Strategic orientation 2: Building trust to boost e-commerce adoption**

This second strategic direction focuses on bolstering trust in e-commerce transactions, and in particular by addressing the “physical part” of these transactions, such as product quality, logistics and delivery activities. To achieve this, it will be necessary to review precisely the actions that have already been carried out or initiated to promote digital trust through partnerships, as outlined in the specific objectives of the first strategic direction.

### **4.2.1 Strategic goal 2.1: Generate trust in e-commerce transactions processes**

- Define a Quality Charter for e-commerce sites and platforms, ensuring it is widely publicized.
- Approve platforms that comply with the Charter's requirements.
- Set up a labelling mechanism for compliant e-commerce sites and platforms.
- Standardize the registration of e-commerce sites and platforms with the Ministry of Trade and Industry, making their legal status and approvals publicly accessible.
- Centralize and disseminate registration information: each merchant site will be required to display its registration number and provide a link to the Ministry of Trade and Industry's dedicated website.
- Monitor technical developments and promote the use of electronic signature certificates alongside the set-up of a PKI in Ghana.
- Promote the development of online payment portals acting as third parties in online transactions.

### **4.2.2 Strategic goal 2.2: Generate trust in e-commerce products**

- Define a comprehensive Quality Charter for products sold on merchant sites or e-commerce platforms, ensuring its existence is communicated effectively to all stakeholders.
- Implement product labelling in compliance with the Charter requirements, enhancing transparency and consumer trust.
- Set up an incentive system to encourage the adoption of e-commerce and digital payments methods, aligning this initiative with existing dematerialized payment programmes.

#### **4.2.3 Strategic goal 2.3: Generate trust in the e-commerce supply chain and its stakeholders**

- Segment the e-commerce supply chain and provide accreditation-labelling mechanisms for each segment according to the definition of a Quality Charter previously defined and validated with sector players in line with the e-commerce supply chain labelling and accreditation policy.
- Encourage the setting up of relay point networks, with some points specifically dedicated to sales for storage and warehousing by sellers, and others for drop-off and delivery to buyers.
- Define a Charter for accreditation-labelling of depots or sales outlets and ensure effective communication regarding its provisions.
- Set up incentive programmes for depot-sales outlets based on transaction volumes (on depot and delivery and user satisfaction rates).
- Identify and segment delivery solutions and methods based on environmental considerations throughout the region.
- Facilitate the implementation and structuring of national e-commerce delivery networks, in return for formalizing operators, notably with a view to road safety.
- Review and take stock of current physical and digital addressing initiatives identifying areas that require enhancement or completion.
- Encourage the creation of a logistics hub dedicated to cross-border e-commerce as part Ghanaian strategy within the AfCFTA context.

#### **4.2.4 Strategic goal 2.4: Review and promote the legal and regulatory framework**

- Take stock of current initiatives aimed at updating e-commerce regulations, including focusing on consumer protection and personal data safeguarding.
- Update the regulatory texts governing e-commerce based on the prior inventory, with particular emphasis on consumer protection and the protection of personal data.
- Enhance, promote and disseminate the legal and regulatory framework.
- Raise awareness among private-sector players of legal and regulatory provisions and best practices in the field of e-commerce.



- Strengthen players' capacities to navigate the legal framework governing e-commerce effectively.
- Centralize recorded disputes and provide anonymized insights on the outcomes of dispute resolution.

#### **4.3 Strategic orientation 3: Supporting a monitoring e-commerce market actors**

The aim of this strategic direction is to support potential e-commerce buyers and sellers at various levels by providing them with a clear entry point to the e-commerce market. This entry point, which will underpin the specific objectives proposed below, can be set up either virtually through the creation of an online platform, or physically by creating of a dedicated unit or observatory.

##### **4.3.1 Strategic goal 3.1: Conduct statistical supervision of the e-commerce market**

- Create a dedicated e-commerce monitoring centre or national e-commerce observatory to track and analyse e-commerce trends and performance.
- Implement a centralized platform to automate and aggregate electronic transactions from merchant sites and e-commerce platforms
- Provide regular reports and detailed analyses on the state of the e-commerce market in Ghana, offering insights for stakeholders and policymakers.

##### **4.3.2 Strategic goal 3.2: Strengthen the business component of e-commerce**

- Establish a status framework for e-commerce professions.
- Support the sectors and national champions identified in the industrial strategy specific to e-commerce (specific objective 1.2) by offering training-incubation, financing, and other resources.

##### **4.3.3 Strategic goal 3.3: Provide an entry point for players interested in e-commerce**

- Create e-commerce centers by capitalizing on complementary projects, such as the development and operation of 214 Community ICT Centers.
- Centralize and share resources related to training-incubation, financing, conferences, to enhance accessibility for entrepreneurs.

- Centralize and disseminate essential information, guidance and support for registration procedures, compliance with standards, labelling and regulations for entrepreneurs aiming to enter the e-commerce market.
- Promote awareness of the legal framework surrounding e-commerce and consumer rights (see specific objective 2.4).
- Facilitate and support the creation and operation of e-commerce business associations.

#### **4.3.4 Strategic goal 3.4: Support and accompany e-commerce market players**

- Support and accompany training programs and incubation centres for entrepreneurs. The centres could be implemented by capitalizing on the experience of the CICs.
- Promote and support awareness campaigns targeting sector players, including consumers, to foster good e-commerce practices;
- Set up mechanisms to protect and defend the interests of the sector's various stakeholders within the sector;
- Facilitate and support the creation of e-commerce consumer associations.
- Encourage and support digital skills development for target groups who would otherwise be unable to participate in e-commerce.
- Implement digital skills enhancement programs (communication, support, financing).
- Improve the digital skills of both online sellers and buyers to improve overall e-commerce engagement.

#### **4.4 Strategic orientation 4: Adapting the strategic framework to make e-commerce inclusive**

##### **4.4.1 Strategic goal 4.1: Encourage and support the development of digital skills**

- Promote the adoption of e-commerce and online payments by effectively communicating the expected benefits to identified populations.
- Develop and implement training programs tailored for different demographics, including youth, women, and marginalized groups, to enhance their digital skills.

**4.4.2 Strategic goal 4.2: Enhance support for players in the rural sector, particularly regarding connectivity**

- Enhance Internet access for consumers and sellers in rural areas, notably through the creation of e-commerce centres (see strategic goal 3.3). Develop and implement training programs tailored for different demographics, including youth, women, and marginalized groups, to enhance their digital skills.
- Engage in digital literacy programs targeting potential players in rural areas.
- Set up e-commerce initiation programs tailored to rural populations.
- Communicate the anticipated benefits of e-commerce to producers offering goods and services identified suitable for online marketplaces.
- Promote and support the development of relay points in rural areas (see strategic goal 2.3).

**4.4.3 Strategic goal 4.3: Provide assistance and resources to populations with specific needs, including women, young people, and people with disabilities**

- Provide priority access to the programs and initiatives for identified vulnerable populations or with specific needs, as outlined in the specific measures and objectives described above.
- Establish targeted monitoring of these populations to provide tailored support, including incubation programs, skills development, and enhanced Internet access.

**4.4.4 Strategic goal 4.4: Facilitate the transition of informal sector players towards formalization**

- Set up incentive mechanisms to encourage informal businesses to transition to e-commerce.
- Promote training and incubation programs for informal entrepreneurs seeking to formalize their businesses.

## 5 GOVERNANCE FRAMEWORK

This strategy defines the objectives to be achieved over the next four years in the field of e-commerce.

To ensure proper governance, the proposed framework will consist of two organs:

- **A High-Level Committee:** this committee will oversee the monitoring and progress of the strategy. It is recommended to leverage the existing national Steering Committee<sup>7</sup>, originally set to track developments resulting from the eT Ready recommendations, by extending its roles and responsibilities for the duration of the implementation of the national e-commerce strategy: For example, the Committee could monitor and review progress of e-commerce strategy, prepare reports and provide recommendations on e-commerce developments and lead consultations on e-commerce issues.
- **An implementation unit secretariat:** this unit will be responsible of the day-to-day operations in line with the strategy. The newly created e-commerce Directorate, in line with strategic goal 1.1, will act as the secretariat for the strategy implementation unit. The Directorate will be responsible for providing regular reports on committee meetings, and overall strategy implementation. It will also facilitate the convening of general committee meetings, as well as technical or additional meetings.

## 6 MONITORING AND EVALUATION

Rigorous monitoring and evaluation of the strategy will be essential to ensure its effective implementation.

The monitoring-evaluation plan outlines how results, activities and resources allocated to the strategy will be systematically assessed. It also details how the information generated will be utilized to improve implementation performance. The monitoring-evaluation plan should cover the following components:

- The purpose and scope of the monitoring and evaluation system
- Identification of players and definition of their roles
- Procedures, modalities, and timelines for data collection, processing, analysis and dissemination
- Data verification and analysis methods
- Methods for disseminating and using data and analyses

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<sup>7</sup> The overall responsibility for e-commerce as a commercial matter will lie with the Ministry of Trade and Industry. The composition and chair of the Committee remain the same as described in section 2.2.1.2.

- Human resources required
- Capacity-building
- Definition of the monitoring and evaluation budget.

Periodic reviews will be integral to the strategy's monitoring and evaluation, to ensure that objectives are being met and to identify any potential project drift.

An annual review of project progress will be carried out, along with a mid-term review of the strategy and associated risks at the end of the third year.

## **7 IMPLEMENTATION PLAN**

A detailed implementation plan will accompany the strategy, outlining the following for each strategic orientation and objective:

- corresponding measures,
- key performance indicators,
- primary stakeholders responsible for implementation. and
- timetable for activities as short-term, medium-term, long-term and ongoing.

This plan will be regularly updated based on the feedback from stakeholders and the outcomes of monitoring and evaluation efforts.