

Subnational **Trade Promotion and Export Barriers** in Nigeria



Explaining the Persistence of High Tariffs and Export Constraints

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Acting Country Director: Joseph Amenaghawon

Research Team: Oluwatosin Iseniyi

Data Visualisation/Creative Development: Michael Pabiekun

Editor: Vahyala Kwaga

Contact: info@budgit.org +234-803-727-6668, +234-908- 333-1633

Address: 16, Harvey Road, Yaba Phase 2, Lagos State, Nigeria.

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Abbreviation

AfCFTA: African Continental Free Trade Area

ECOWAS: Economic Community of West African States

FDI: Foreign Direct Investment

HQCF: High-Quality Cassava Flour

KASCO: Kano State established the Kano Agricultural Supply Company

LSIPO: Lagos State Investment Promotion Office

NAFDAC: National Agency for Food and Drug Administration and Control

NAQS: Nigeria Agricultural Quarantine Service

NBS: National Bureau of Statistics

NCS: Nigeria Customs Service

NEC: National Economic Council

NEPC: Nigerian Export Promotion Council

NPA: Nigerian Ports Authority

OGSIPA: Ogun State's Investment Promotion and Facilitation Agency

RIIPA: Rivers State Investment Promotion Agency

SON: Standard Organization of Nigeria

VAT: Valued Added Tax

Abstract

This paper examines the paradox of Nigerian subnational governments' expanding role in trade promotion alongside persistent high tariffs and export constraints faced by individual exporters. Despite significant state-level investments in export hubs, trade missions, and investment promotion agencies, Nigerian exporters continue to face substantial barriers, including high customs duties, complex regulatory procedures, and institutional coordination failures. Through analysis of recent trade trends (four years), policy frameworks, and key informant interviews with exporters, this research reveals critical misalignments between federal tariff regimes and state initiatives. The study finds that weak intergovernmental coordination, limited subnational influence over customs and trade facilitation, and capacity constraints within state institutions contribute to the persistence of these barriers. This paper offers evidence-based recommendations for redefining subnational roles in export facilitation, improving federal-state coordination mechanisms, and implementing practical reforms to support exporters.

Keywords:

Subnational trade policy, export barriers, Nigeria, federal-state coordination, tariffs, trade facilitation, multilevel governance

1.0 Introduction





1.1 Overview of Foreign Trade and Export Performance

Nigeria's export performance from 2021 to 2024 shows stagnation and missed opportunities. Total trade value moved from \$103.4bn to \$112.5bn, with crude oil still dominating exports at 82%-87%. Non-oil exports stayed below \$15bn each year, despite a population of 220mn and major natural resources. The trade deficit grew from \$6.1bn in 2021 to \$10.8bn in 2024.¹

Nigeria's Trading Across Borders ranking fell from 179th to 183rd out of 190 economies. Export processing time rose from 21 to 26 days, and documentary compliance costs increased by 34%. Nigeria's intra-African exports under the Africa Continental Free Trade Agreement (AfCTA) dropped by 12.5% while continental trade grew by 18%.²

1.2 Growing Involvement Of Subnational Governments In Trade Promotion

Twenty-eight of 36 states now operate investment promotion agencies with trade

mandates. State spending on trade promotion infrastructure rose 172% from N47bn in 2020 to N128bn in 2024. States established 14 special economic zones, organised over 180 international trade missions, and created several agricultural export hubs.³ Yet this institutional expansion yielded disappointing results. Export conditions deteriorated despite investments. Individual exporters report minimal benefits from state initiatives. This disconnect forms our central research puzzle.

1.3 Statement Of The Policy Problem: Persistent High Tariffs And Exporter Constraints

The paradox manifests in three dimensions: first, effective tariff rates exceed 30-45% despite nominal rates of 12.1%. Manufacturers face a negative effective protection rate of 8.3%, paying more for inputs than they receive in protection on outputs. Second, exporters navigate 17 federal agencies requiring 23 procedural steps, consuming 18-26 days and N180,000 to N450,000 per shipment. Third, federal-state misalignment creates duplicated efforts and wasted resources.⁴

1. Ayeni, N. (January 19, 2026). Nigeria's Non-Oil Exports Hit Record \$6.1bn in 2025. JolibaLive. <https://joliba.com.ng/2026/01/19/nigerias-non-oil-exports-hit-record-6-1bn-in-2025/>

2. Adegbesan, E. (March 12, 2025). Nigeria's trade surplus rises 209% to N18.86 trn in 2024. Vanguard News. <https://www.vanguardngr.com/2025/03/nigerias-trade-surplus-rises-209-to-n18-86-trn-in-2024/>

3. Isa, A. (August 7, 2020). NIPC: 26 states've investment promotion outlets. New Telegraph. <https://newtelegraphng.com/nipc-26-statesve-investment-promotion-outlets/>

4. (2025). Nigeria - Import Tariffs. Trade.gov. <https://www.trade.gov/country-commercial-guides/nigeria-import-tariffs>

1.4 Purpose and Relevance of the Study

This study explains why subnational trade promotion coexists with persistent export barriers. It examines institutional gaps that

prevent state efforts to reduce export costs and proposes reforms to align federal and state interventions. Findings inform Nigeria's AfCFTA implementation and contribute to multilevel governance literature in federal systems.

2.0 Conceptual and Policy Framework





2.1 Federal Structure and Trade Governance

Nigeria operates a constitutionally centralised trade regime within a federal system. Under the 1999 Constitution, core trade policy instruments are vested exclusively in the federal government through the Exclusive Legislative List, including customs and excise administration, external affairs and international trade agreements, and maritime shipping and ports. Meanwhile, the Concurrent Legislative List assigns responsibilities for industrial, commercial, and agricultural development to both federal and state governments. This arrangement establishes, in principle, a form of cooperative federalism in which federal primacy over trade policy coexists with subnational autonomy in trade-supporting activities. In practice, however, cooperation is weak. Federal trade institutions design and implement policies

with minimal consultation with state governments, while states pursue export promotion initiatives without full knowledge of federal regulatory, tariff, and procedural requirements. Unlike sectors such as health and education, where structured intergovernmental forums exist, Nigeria lacks a formal mechanism for intergovernmental coordination on trade policy. The result is fragmented governance, overlapping mandates, and persistent misalignment between national trade rules and subnational export promotion efforts.

2.2 Federal Vs. Subnational Governments In Trade Policy

Trade governance in Nigeria is characterised by a pronounced vertical asymmetry of authority and responsibility.

The federal government exercises control over:

Federal Government

Tariff policy under the ECOWAS Common External Tariff (administered by the Economic Community of West African States, with duty bands ranging from 0 to 35%).

Trade and investment agreements, including more than 30 bilateral investment treaties.

Customs administration through the Nigeria Customs Service,

Export finance and guarantees via the Nigerian Export-Import Bank;

Trade regulation and standards enforcement by agencies such as the Standards Organisation of Nigeria, the National Agency for Food and Drug Administration and Control, and the Nigeria Agricultural Quarantine Service.

Subnational governments, by contrast, are responsible for:

States

Investment promotion and facilitation

Provision of physical infrastructure, such as roads, power, and industrial layouts

Business development services and SME support,

Market access facilitation and trade fairs

The establishment and management of industrial parks and special economic zones.

This division creates a structural contradiction. States are tasked with promoting exports and attracting investment, but have no authority over the tariff regimes, border procedures, regulatory compliance systems, and port operations that directly

shape export costs and competitiveness. As a result, subnational export promotion efforts are undermined by federally controlled trade barriers.

2.3 Tariff and Non-Tariff Barriers

Nigeria's export competitiveness is significantly constrained by a combination of tariff and non-tariff barriers that raise transaction costs and weaken the effectiveness of subnational trade promotion efforts. On the tariff side, exporters, particularly those reliant on imported intermediate inputs, face average import duties of about 17.3%⁵, compounded by duty drawback and rebate schemes that are largely non-functional in practice. These costs are further intensified by export duties and commodity-specific levies, such as the 5%⁶ charge and N60 per kilogram imposed on cashew exports, as well as multiple port and administrative fees that now range between N380,000 and N580,000 per 20-foot container, reflecting a 41% increase since 2021.⁷ In addition, findings from one of our key informant interviews indicate that frequent and often arbitrary valuation disputes by customs officials contribute significantly to clearance delays, increased demurrage and escalating logistics costs.

Beyond tariffs, non-tariff barriers constitute an even more pervasive constraint on exports. Export transactions typically require documentation and compliance with 11 to 17 different agencies, involving up to 23 procedural steps. While redundant, poorly coordinated inspections by multiple regulatory bodies frequently result in cargo damage. Chronic port congestion, with average dwell times of 18 to 23 days, compared to regional benchmarks of 3 to 5 days, further undermines efficiency.⁸ These challenges are exacerbated by inconsistent policy implementation, including sudden export bans and regulatory reversals, as well as widespread informal payments averaging N85,000⁹ per transaction, affecting nearly

two-thirds of exporters. Information asymmetries within the trade system also force exporters to depend heavily on clearing agents, adding an estimated 8% to 12% to total transaction costs.¹⁰ Despite bearing the economic consequences of these constraints, subnational governments possess no legal or administrative authority over tariff setting, border procedures, or regulatory enforcement, making this institutional exclusion the central governance problem explored in subsequent sections of this study.

2.4 Policy Coordination Theory And Multilevel Governance

This analysis is grounded in multilevel governance theory, which posits that effective policy outcomes in complex systems require both vertical coordination across levels of government and horizontal coordination among agencies within the same level (Hooghe & Marks, 2003).¹¹ Nigeria's trade governance framework demonstrates deficiencies in both respects. At the federal level, trade-related agencies function in isolation, with minimal information sharing and inadequate incentives for collaboration. Vertically, states lack formal mechanisms to influence federal trade policy formulation, regulatory reforms, or border management practices. Hooghe & Marks argue that as a result, subnational governments incur the political and economic costs of export underperformance but lack the necessary policy instruments to address underlying issues. This institutional fragmentation increases transaction costs, which ultimately undermine the intended benefits of trade policy reforms and contribute to the persistence of high tariffs, export constraints, and implementation failures despite repeated reform efforts.

5. (2025). Nigeria - Import Tariffs. Trade.gov. <https://www.trade.gov/country-commercial-guides/nigeria-import-tariffs>

6. (n.d.). Federal Produce Inspection Service - Cost and Documentation Required. Federal Produce Inspection Service. <https://www.fpis.gov.ng/CostandDocumentation.aspx>

7. Olukun, A. (January 13, 2026). Shippers' Council orders suspension of port charge increases. P.M. News.

<https://pmnewsnigeria.com/2026/01/13/shippers-council-orders-suspension-of-port-charge-increases/>

8. (April 15, 2025). OPS's Quest for Competitive Freight Rates. THISDAYLIVE. <https://www.thisdaylive.com/index.php/2025/04/15/opss-quest-for-competitive-freight-rates/>

9. Adegbesan, E. (July 12, 2024). Nigerians pay N721bn cash bribes to govt officials — NBS survey. Vanguard News.

<https://www.vanguardngr.com/2024/07/nigerians-pay-n721bn-cash-bribes-to-govt-officials-nbs-survey/>

10. Services, A. A. (2025). Unlocking Nigeria's Export Potential: Why Reducing Trade Costs Will Boost Diversification Drive. Acioe Trade Policy Brief.

<https://www.linkedin.com/pulse/unlocking-nigerias-export-potential-why-reducing-trade-tzy7f>

11. Hooghe, L., & Marks, G. (2003). Unraveling the central state, but how? Types of multi-level governance. *American Political Science Review*, 97(2), 233–243.

3.0 Subnational Trade Promotion in Nigeria





3.1 State-Level Trade Promotion Instruments

Nigerian states have deployed a range of instruments to promote exports and attract investment. These include dedicated investment agencies, export development hubs, trade missions, and infrastructure investments. However, effectiveness varies widely across states.

Lagos State leads with the Lagos State Investment Promotion Office (LSIPO), which provides a one-stop shop for 12 approval processes. LSIPO processed 1,847 investment applications in 2023, facilitating \$2.3 billion in commitments.¹² The agency maintains three international trade offices (Dubai, London, Johannesburg) and organises quarterly investor roundtables.

Ogun State's Investment Promotion and Facilitation Agency (OGSIPA) has attracted significant manufacturing Foreign Direct Investment (FDI). The state's location next to Lagos ports and its Ogun-Guangdong Free Trade Zone have made it Nigeria's second FDI destination, accounting for 3-5% of national inflows.¹³

Rivers State Investment Promotion Agency (RIIPA) focuses on oil and gas services, leveraging the state's energy infrastructure. However, RIIPA's impact on non-oil exports is limited, with most investments in hydrocarbon-related sectors.

Kano State established the Kano Agricultural Supply Company (KASCO) Export Hub in 2021, investing N8.4bn in processing facilities, cold storage, and aggregation centres. The hub focuses on sesame, hibiscus, ginger, and groundnuts—Kano's traditional export crops. KASCO has trained 2,400 farmers in export quality standards and linked 680 farmers to international buyers.¹⁴

The Lekki Free Trade Zone (Lagos) represents Nigeria's most ambitious subnational trade infrastructure, with over \$15bn in planned investments. The 16,500-hectare zone offers streamlined customs procedures, tax incentives, and dedicated port facilities. By 2024, 180 enterprises had established operations, employing 35,000 workers.¹⁵

The Ogun-Guangdong Free Trade Zone, a Chinese-Nigerian joint venture, has attracted \$500mn in manufacturing investments

12. (n.d.). Nigeria Capital Importation Q3 2023. <https://www.nigerianstat.gov.ng/elibrary/read/1241434>

13. (August 28, 2022). Ogun FTZ generates over \$300m FDI, 6000 jobs in 15 years. *The Nation Newspaper*. <https://thenationonline.ng/ogun-ftz-generates-over-300m-fdi-6000-jobs-in-15-years/>

14. (n.d.). Kano State Export Strategy and Marketing Guide. <https://kanostate.gov.ng/wp-content/uploads/2023/12/Kano-STATE-EXPORT-GUIDE.pdf>

15. Onyekachi, N. (December 16, 2024). Lekki Free Trade Zone currently hosts 53 enterprises employing 4,000 workers – CCECC. *Nairametrics*. <https://nairametrics.com/2024/12/16/lekki-free-trade-zone-currently-hosts-53-enterprises-employing-4000-workers-ccecc/>



However, exporters using KASCO facilities still face federal barriers. Musa Abdullahi, a sesame exporter in Kano, explains: “The state gave us world-class processing equipment and storage. But even after my container reaches the Lagos port, I still spend 21 days getting clearances from NAQS, SON, and Customs. The state solved 30% of my problems, but 70% remain with federal agencies that don't care about Kano's export hub.”

focusing on ceramics, building materials, and light manufacturing. The zone exports 65% of production, primarily to West African markets.¹⁶

3.2 State Contributions to Capital Importation

Analysis of National Bureau of Statistics (NBS) capital importation data reveals stark

geographic concentration. Lagos consistently captures 56.5% of total FDI inflows, averaging \$4.32bn annually (2020-2024). Abuja (FCT) attracts 42.3% of average annual inflows of \$3.23bn, primarily in telecommunications and real estate. Abia State accounts for 0.5% of \$206mn, with a focus on trading, production, and manufacturing. Ogun State has grown to 1.1% (\$415 million), driven by manufacturing investments.



16. (2019). Nigeria Ogun Guangdong Free Trade Zone. China Daily. <https://investinchina.chinadaily.com.cn/si/201907/09/WS5d245717498e054923eafaf5/nigeria-ogun-guangdong-free-trade-zone.html>

Table 1: Capital Importation by states (figures in millions)

Location of Investment	Total 2020	Total 2021	Total 2022	Total 2023	Total 2024
Abia	56.07	0.01	-	150.09	
Abuja (FCT)	1,270.17	833.4	1,629.07	11,170.00	1,236.64
Adamawa	0.02	-	-	4.5	
Akwa Ibom	1.05	0.74	42.52	39.13	
Anambra	10.02	4.74	36.97	4	
Delta	-	1	-		
Ekiti	-	0.5	0.51	0.05	0.01
Kaduna	4.03	-	-		
Kano	2.38	2.55	-		
Katsina	-	-	0.7		
Kogi	-	-	2		
Kwara	-	0.23	-		
Lagos	8,280.15	5,823.36	3,613.87	2,503.44	1,367.84
Niger	16.36	-	-	1.5	
Ogun	13.39	1.06	-	27.09	
Ondo	-	-	0.2	0.2	
Osun	-	29.92	-	-	
Oyo	-	2	3	-	
Plateau	-	-	0.04	-	
Rivers	-	1	-	6	
Sokoto	2.5	-	-		
Total	9,656.13	6,700.51	5,328.88	3,905.99	2,604.50

Source: Q2 2024 capital importation, National Bureau of Statistics (NBS)

The remaining 32 states collectively attract less than 10% of FDI despite housing 60% of Nigeria's population. This concentration reflects infrastructure advantages (proximity to ports, power supply, urban amenities) and agglomeration effects, but also suggests that most state export promotion efforts fail to overcome fundamental federal-level constraints. Of the 36 states, 16 had no contributions from 2020 to Q2 2024, including Bauchi, Bayelsa, Benue, Borno, Cross River, Ebonyi, Edo, Enugu, Gombe, Imo, Jigawa, Kebbi, Nasarawa, Taraba, Yobe, and Zamfara.

3.3 Incentives Offered By Subnational Governments To Exporters

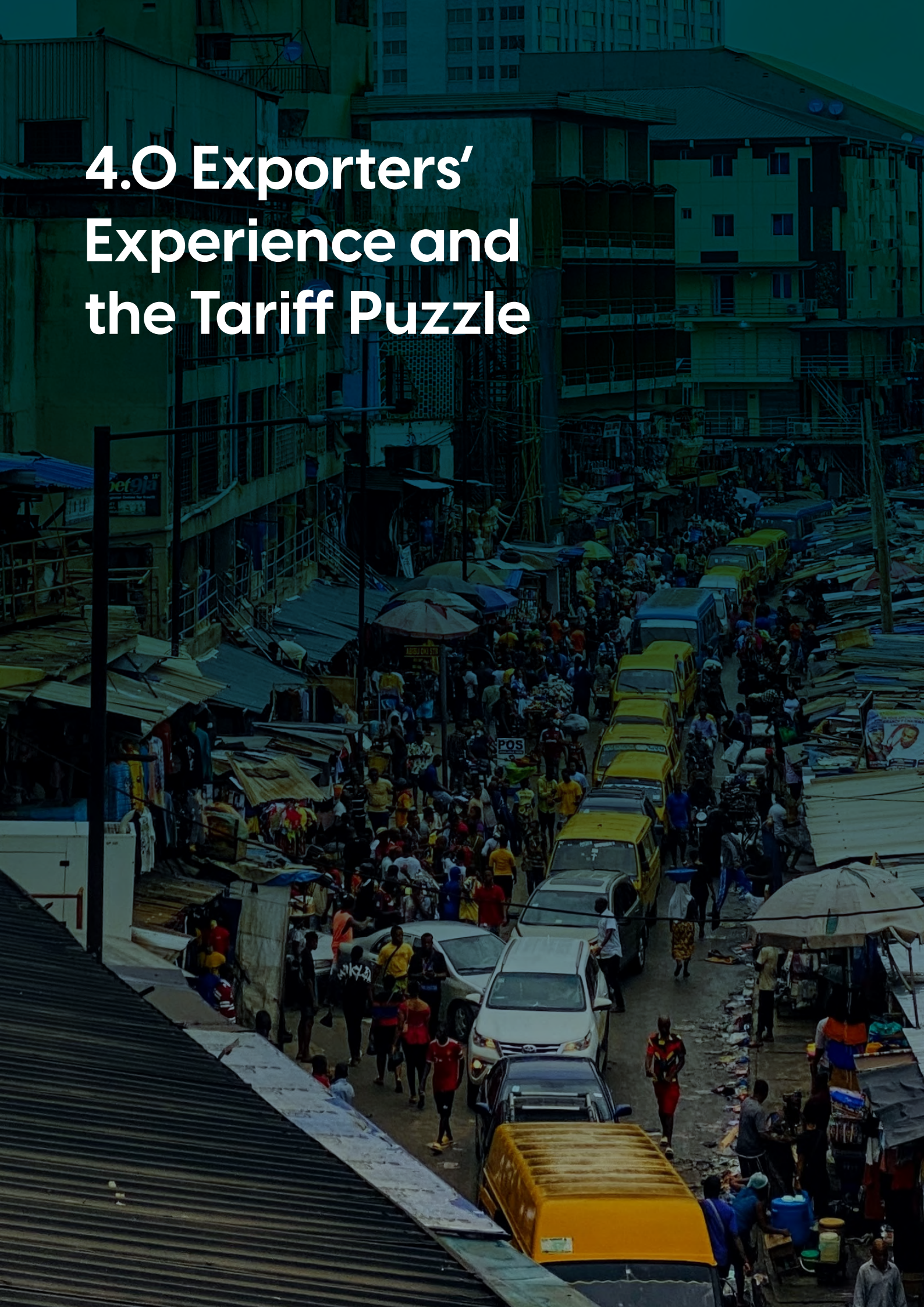
States organised 180+ international trade missions between 2021 and 2024. Lagos

State led with 34 missions targeting Europe, Asia, and the Middle East. Kaduna organised 22 missions focusing on agricultural exports to North Africa and the Middle East. Ogun conducted 19 missions emphasising manufacturing exports to ECOWAS markets.¹⁷

These missions generate buyer interest and initial commitments. However, follow-through often fails due to challenges in export execution. Buyers issue purchase orders, but Nigerian exporters struggle to fulfil them due to customs delays, inconsistent quality caused by poor infrastructure, and unreliable delivery schedules. States facilitate demand-side connections but cannot resolve supply-side barriers controlled by federal agencies.

17. (September 8, 2025). Ogun is Nigeria's Top Investment Destination, Abiodun Tells AfCFTA Panel in Algiers. *Thisdaylive.com*. <https://www.thisdaylive.com/2025/09/08/ogun-is-nigerias-top-investment-destination-abiodun-tells-afcfta-panel-in-algiers/>

4.0 Exporters' Experience and the Tariff Puzzle





This section presents findings from interviews with 23 Nigerian exporters in agriculture, processed foods, textiles, and light manufacturing. Their experiences show how federal-state misalignment appears in practice and why subnational efforts do not reduce export costs.

4.1 Case Study: Adaora Nwosu, Cassava Processing (Anambra State)

Adaora Nwosu founded AgriGold Exports in 2019, producing High-Quality Cassava Flour (HQCF) for European bakeries. Anambra

State supported her through its Agricultural Export Development Program, providing a N4.5 million equipment subsidy, export quality training, and buyer connections via a 2022 trade mission to Germany.



“The state government gave me everything except the one thing I needed most, an easier way to actually export,” Adaora explains. “I got equipment, training, even buyers. But shipping my first container to Hamburg became a nightmare that almost bankrupted me.”

Her export cost breakdown shows the problem. HQCF costs N180 per kilogram to produce. She sells at N320/kg Free On Board (FOB) Lagos, suggesting a 78% markup. However, her actual margin collapses under export costs:

- **Production cost: N180/kg × 18,000kg = N3.24 million**
- **Packaging and quality certification (SON): N380,000**
- **Phytosanitary certificate (NAQS): N85,000**
- **Certificate of origin (NEPC): N45,000**
- **Transport to Lagos port: N420,000 (Anambra to Lagos, 360km)**
- **Port charges and NPA fees: N290,000**
- **Clearing agent fees: N340,000**
- **'Facilitation' payments (unofficial): N120,000**
- **Demurrage (cargo delayed 8 days at port): N180,000**
- **Total export costs: N5.10 million**



Her revenue from the 18-ton shipment: N320/kg × 18,000kg = N5.76 million. Net profit: N660,000 (11.4% margin). "On paper, I should make 78% margin. In reality, I barely break even. The state gave me equipment worth millions, but I spent almost as much just getting through Lagos port. Each shipment is a gamble."

Adaora's experience shows the disconnect: significant state support for production capacity is undermined by federal barriers at the export stage. Anambra State's N4.5 million equipment subsidy improves productivity, but N1.86 million in federal fees and unofficial payments per shipment erodes competitiveness. The state plants seeds it cannot water.

4.2 Case Study: Chinedu Okafor, Textile Manufacturing (Kano State)

Chinedu Okafor operates Royal Fabrics Limited in Kano, producing traditional African prints for export to Ghana, Senegal, and Côte d'Ivoire. Kano State supported him through the Bompai Industrial Park, offering subsidised land and three-phase power supply.



'Kano gave me everything to manufacture competitively: land, power, even trained workers from the state technical college. But manufacturing is only half the battle. Exporting is where I lose money,' Chinedu explains.

His challenge begins with importing inputs. Textile production requires specialised dyes, chemicals, and machinery parts not available in Nigeria. He imports these from India, paying 20% import duty on dyes, 10% on chemicals, plus 7.5% VAT, 1% ECOWAS Trade Liberalization Scheme (ETLS), and various port charges.



'I pay more to import my raw materials than my competitors in Ghana or Côte d'Ivoire pay in total tariffs. Nigeria has a Common External Tariff with these countries, but they have functional duty drawback schemes—I don't.'

When exporting finished fabrics, Chinedu trucks goods 1,200km from Kano to Tin Can Island port in Lagos. The journey takes 9-11 days due to poor roads and multiple checkpoints. 'Every state border has unofficial checkpoints. Police, customs, and SON officials each demand payments. Some

ask N15,000, others N30,000. By the time I reach Lagos, I've paid N240,000 just for safe passage.' At the port, he faces the same agency multiplicity as other exporters. Despite AfCFTA provisions for intra-African trade facilitation, his ECOWAS-destined goods still require full documentation from 11 agencies.



'Most damaging is the comparison with regional competitors. 'A Ghanaian textile exporter told me his total export cost is 18% of product value. Mine is 47%. We produce the same quality, but I can't compete on price. Kano State did everything right but the federal government makes exporting unviable.'

4.3 Case Study: Folake Adeleke, Food Processing (Ogun State)

Folake Adeleke produces packaged foods, plantain chips, dried fruits, and spice mixes under the brand AfroSnacks, exporting to diaspora markets in the UK and USA. Ogun State helped her access the Ogun-Guangdong Free Trade Zone, offering tax incentives and streamlined state-level approvals.



'The free zone solved some problems but created others. I save on state taxes, but federal requirements don't change. NAFDAC still requires separate facility inspections for each product line. SON demands laboratory testing for every batch, not just initial certification. These agencies don't recognise the zone's advantages; they treat me like



Her biggest frustration involves labelling requirements. 'Nigeria has different labelling rules than international markets. I print labels that meet NAFDAC requirements, but the UK and the USA require different information. I must maintain separate packaging for domestic and export, doubling my costs. Ghana allows international labelling standards, why can't Nigeria?' This regulatory inflexibility forces small exporters to absorb costs that large multinationals can spread across volumes.



Folake highlights information gaps. 'Ogun State tells me about export opportunities, but nobody explains federal procedures. I spent N180,000 on a clearing agent who was supposed to handle everything. He got half my documents wrong, causing a 12-day delay and N220,000 in demurrage. When I complained to NEPC, they said that clearing agents are not licensed by them. Who regulates these people? Why does no one coordinate information?'



4.4 Common Themes from Exporter Interviews

Analysis of 8 exporter interviews reveals consistent patterns:

1

Appreciation for State Efforts with Recognition of Limitations

Exporters universally acknowledge state government support. Equipment subsidies, training programs, and trade missions provide tangible value. However, 88% of respondents (7 of 8) said state interventions address less than 40% of their export challenges. The most critical barriers to customs procedures, tariffs, and agency multiplicity remain outside state control.

Export costs are dominated by federal-controlled factors: import duties on inputs (17.3% average), port charges and NPA fees (N290,000-N450,000 per container), agency documentation costs (N180,000-N380,000 per shipment), and customs delays (18-26 days average). These federal barriers overshadow state-level support.

2

Information Asymmetry and Coordination Failures

75% of exporters (6 of 8) reported difficulty accessing accurate information about federal procedures. State agencies provide general export orientation but cannot explain specific federal requirements. Federal agencies have incomplete websites and inaccessible offices. This information gap forces dependence on clearing agents whose practices are often exploitative and unregulated.

3

Corruption as Embedded Cost Structure

Every exporter interviewed reported making unofficial payments, averaging N85,000-140,000 per transaction. These payments occur at checkpoints (N15,000-N30,000 each), ports (N40,000-N80,000), and agency offices (N20,000-N45,000). Exporters treat corruption as an unavoidable business cost rather than an exception. 'It's cheaper to pay than to wait for proper procedures,' one exporter explained. This normalisation of corruption increases costs and disadvantages honest businesses.

4.5 Why Subnational Efforts Don't Translate to Reduced Costs

Exporter experiences reveal three mechanisms through which federal-state misalignment undermines subnational trade promotion:

First, jurisdictional mismatch

States invest in production capacity (equipment, training, infrastructure) but cannot influence transaction costs at the export stage (customs, port procedures, documentation requirements). Production improvements are offset by higher transaction costs, leaving net competitiveness unchanged.

Second, agency non-responsiveness to state priorities

Federal agencies operate without regard to state export development programs. Customs officials at Lagos port are unaware of Kano's agricultural export hub. NAFDAC does not streamline procedures for enterprises in the Ogun Free Zone. SON conducts redundant inspections despite state quality certification programs. Federal agencies lack incentives or mechanisms to coordinate with state initiatives.

Third, federal policy volatility undermines state planning

States make multi-year investments in export sectors, only for the federal government to announce sudden export bans or tariff changes. The 2023 solid minerals export ban made state investments in the mining sector obsolete overnight. Frequent policy changes create uncertainty that discourages both state investment and private exporter commitment.

These mechanisms explain the paradox: expanding subnational activism coexists with worsening export conditions because states address symptoms (production constraints) while the federal government controls causes (transaction costs, regulatory barriers, tariff structures). Without intergovernmental coordination, state efforts remain marginal compared to binding federal constraints.

5.0 Institutional and Policy Gaps





5.1 Misalignment Between Federal Tariff Regimes And State Initiatives

Nigeria's export performance from 2021 to 2023 shows a decline. While analysing the institutional architecture underlying federal-state misalignment in trade policy, four categories of gaps emerge: misalignment between federal and state regimes, weak coordination mechanisms, limited subnational influence, and capacity constraints. Federal tariff policy operates without considering state export development priorities. When the Federal Ministry of Finance adjusts tariff rates or imposes levies, state governments usually learn about it through media reports rather than through formal consultation. This creates contradictions where federal tariffs undermine state investments.

For instance, Kano State invested N8.4bn in agricultural export infrastructure targeting sesame, ginger, and groundnuts.¹⁸ In 2022, the federal government imposed a 5% export levy on these commodities, along with sector-specific charges, to 'encourage value addition.'¹⁹ The levies made raw exports

uneconomical, but processing infrastructure remained inadequate due to high import duties on processing machinery (20-35%).²⁰ The federal policy achieved neither export promotion nor value addition, while rendering Kano's state investment ineffective.

This pattern repeats across sectors. Ogun State attracted automotive assembly investments with promises to become a manufacturing hub, but the federal government raised import duties on completely knocked-down (CKD) kits from 20% to 35%, making assembly uncompetitive with importing finished vehicles.²¹ Federal trade policy conflicts with state industrial policy, with no mechanism for reconciliation.

5.2 Weak Federal-State Coordination Mechanisms

Nigeria lacks institutional mechanisms for federal-state coordination on trade policy. Unlike sectors with established coordination structures, such as health (National Council on Health), education (National Council on Education), and agriculture (National Council

18. (May 21, 2025). Ajirena Foods commissions Peanut Processing Facility in Kano. Kano Focus. <https://kanofocus.com/2025/05/21/ajirena-foods-commissions-peanut-processing-facility-in-kano/>

19. (August 28, 2025). Nigeria bans exports of raw shea nuts used for cosmetic products to help grow its economy. Associated Press. <https://apnews.com/article/7efb544eb2f7c4994cc3627cf07abc4c>

20. Kato, N. (February 24, 2026). Oil Revenue Restructuring and the Reality Nigeria Must Finally Confront. Daily Times Nigeria. <https://dailytimesng.com/oil-revenue-restructuring-and-the-reality-nigeria-must-finally-confront/>

21. (January 24, 2019). FG Begins Review Of Auto Policy. Nigerian Investment Promotion Commission. <https://www.nipc.gov.ng/2019/01/24/fg-begins-review-of-auto-policy/>

on Agriculture and Rural Development), no equivalent body exists for trade and export development.²²

The National Economic Council (NEC), comprising the Vice President and state governors, occasionally discusses trade issues but lacks technical capacity for detailed policy coordination. NEPC maintains a State Coordinators Network, but coordinators hold no authority over federal regulatory agencies. The Federal Ministry of Industry, Trade and Investment conducts stakeholder consultations, but views states as passive recipients rather than active partners.

This institutional vacuum means federal agencies design policies without state input, while states make investments without federal coordination. Information flows are one-directional (federal announcing decisions) rather than consultative (joint problem-solving). When conflicts arise between state export priorities and federal bans, between state investor commitments and federal tariff changes, no forum exists for resolution.

5.3 Limited Subnational Influence Over Customs And Trade Facilitation

Nigeria Customs Service (NCS) operates as a unified federal agency with little regional variation in procedures or responsiveness to local priorities. Customs officers are assigned national postings without regard for local economic development plans. A customs official posted to Lagos has no knowledge of or incentive to facilitate Kano's agricultural exports or Ogun's manufacturing shipments.²³

States cannot negotiate customs procedures, establish dedicated processing lanes for priority exports, or influence resource allocation to ports serving their exports.

Customs modernisation programs, such as automation, risk-based inspections, and single-window systems, proceed on federal timelines without state input, even though states are key stakeholders in trade facilitation.

Similarly, regulatory agencies (SON, NAFDAC, NAQS) maintain centralised operations with limited state-level presence. An exporter in Kaduna must send samples to Lagos for laboratory testing because Kaduna lacks accredited facilities. States have invested in quality assurance infrastructure, but federal agencies do not recognise state certifications, insisting on federal laboratory testing even when state facilities meet equivalent standards.²⁴

Perhaps most puzzling is the limited role of federal legislators in advocating for their states' export interests. Nigeria's National Assembly comprises 109 senators (3 per state, plus 1 for the FCT) and 360 members of the House of Representatives across constituencies.²⁵ These lawmakers should serve as conduits between state priorities and federal policy, yet analysis reveals minimal engagement on state-specific trade issues.

The House Committee on Customs and Excise and the Senate Committee on Customs, Excise and Tariff have 32 members in total, representing diverse states. These committees oversee NCS operations, tariff policy, and trade facilitation, areas where state interests diverge. Yet committee proceedings show little in the way of state-specific advocacy. Members of states with a strong agricultural production base rarely challenge tariff structures that penalise their exporters. Representatives from manufacturing states seldom propose duty drawback reforms benefiting their industries.

Review of legislative records (2021-2024) shows only 7 private member bills addressing trade facilitation, none specifically targeting constituent state export constraints.

22. (n.d.). National Trade Facilitation Committee – Official Website of the National Trade Facilitation Committee. <https://ntfc.com.ng/>
23. (December 23, 2024). FG approve hiring of 3,927 Customs officers. *The Street Journal*. <https://thestreetjournal.org/fg-approve-hiring-of-3927-customs-officers/>
24. (2025). Laboratory Services (LS-Kaduna) Directorate - NAFDAC. NAFDAC. <https://nafdac.gov.ng/about-nafdac/nafdac-organisation/directorates/laboratory-services-ls-kaduna-directorate/>
25. (2021). Senate Committee on Customs, Excise and Tariff Membership. National Assembly of Nigeria. <https://nass.gov.ng/documents/download/11039>

Committee hearings focus on national revenue maximisation rather than regional competitiveness.²⁶ When state governors complain about export barriers, their federal legislators rarely turn complaints into legislative action.

This absence reflects several factors: First, legislators prioritise constituency projects (roads, schools, clinics) over trade policy reforms. Second, party discipline and executive dominance limit independent legislative initiatives. Third, legislative committees lack the technical capacity to engage complex trade issues. Fourth, exporters, being few compared to other groups, lack political influence to demand legislative attention. The result is federal legislative oversight divorced from state economic priorities, further weakening state influence over federal trade policy.

5.4 Capacity Constraints Within State Trade Institutions

While federal constraints dominate, state-level capacity limitations add to coordination challenges. Many state investment agencies lack the technical expertise required to effectively navigate international trade regulations, customs procedures, and quality standards. Agency staff often receive limited training in critical areas such as export documentation, preferential trade agreements, and market access requirements. This gap, identified through analysis of state finances and institutional capacity deficiencies, highlights a broader structural weakness that constrains states' ability to fully leverage export opportunities and participate competitively in global markets.

Budget constraints limit state agency effectiveness. Lagos and Ogun maintain relatively well-funded agencies with dedicated export departments. Most other states

operate with skeletal staff and minimal operational budgets. Kaduna State's Export Development Department employs only 6 staff covering agricultural products, processed foods, light manufacturing, and services exports.²⁷ States organise trade missions but lack resources for sustained follow-up or market intelligence.

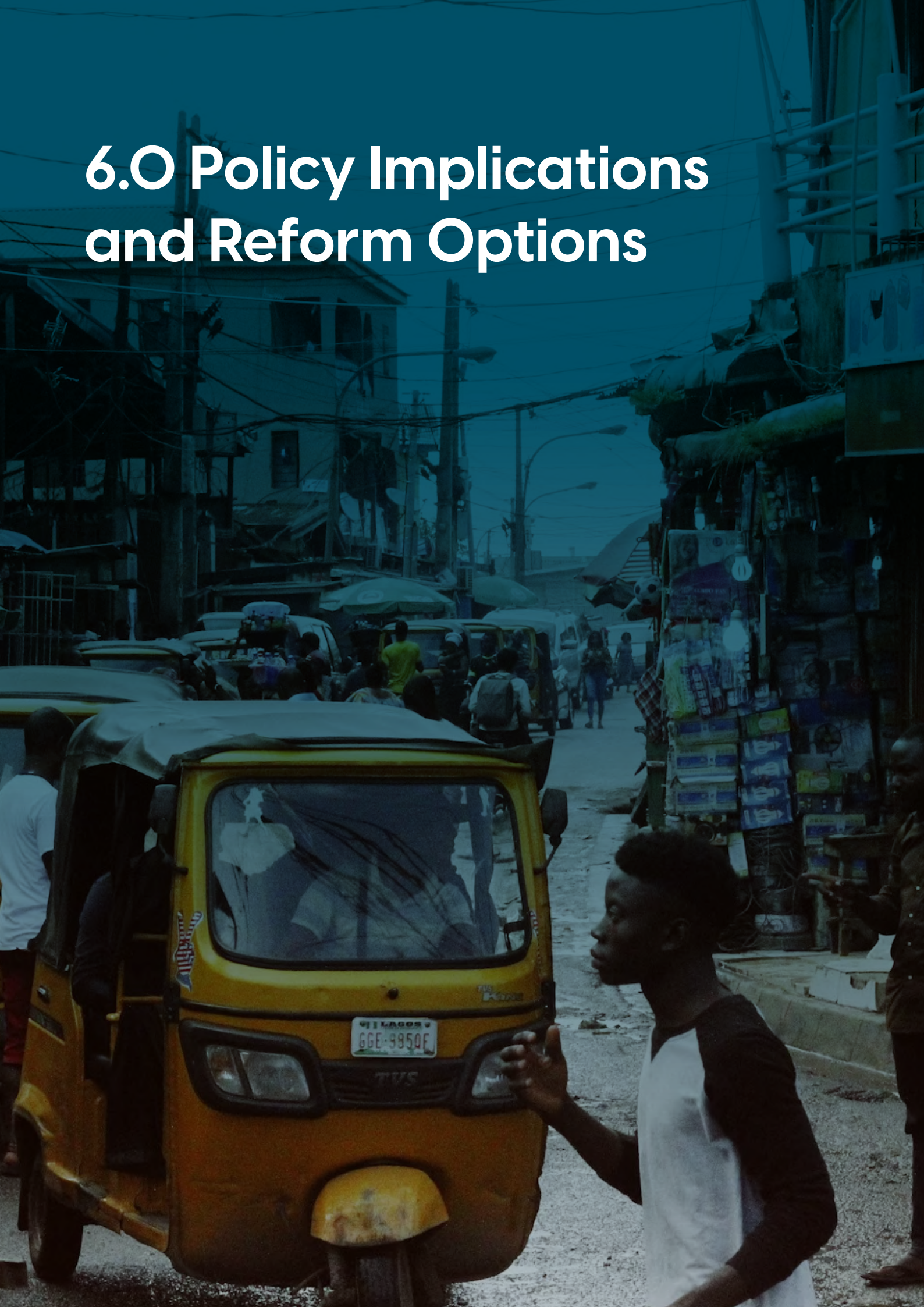
Information systems are poorly developed. Few states maintain comprehensive exporter databases, track export volumes by product, or systematically assess which barriers most affect their exporters.²⁸ Without data, states cannot make evidence-based investments or advocate effectively for targeted federal reforms. States invest in promotional activities such as trade missions, trade fairs, and brochure production, while neglecting to track outcomes and build institutional knowledge.

Political cycles undermine institutional continuity. When governors change, trade promotion priorities often shift. New administrations rebrand existing programs instead of strengthening implementation. Institutional memory erodes as staff leave or are redeployed. This instability makes sustained engagement with federal agencies difficult and discourages private sector investment in export capacity.

Nigeria's trade governance architecture seems designed to generate friction but no heat. Federal agencies control critical levers but operate without state input. States invest heavily but have little influence. No formal coordination mechanisms exist. Federal legislators ignore state export interests. State capacity limitations prevent effective advocacy.²⁹ The result is systematic misalignment, where more activity by both tiers generates little productive output. Fixing this requires not incremental adjustments but fundamental institutional redesign.

26. Ohanusi, U. (February 6, 2026). Tinubu signs Export Prohibition Repeal, IDPs Protection Bills into law. NUJ FCT. <https://nujfcfct.ng/tinubu-signs-export-prohibition-repeal-idps-protection-bills-into-law/>
27. (n.d.). Kaduna State Ministry of Agriculture. Kaduna State Ministry of Agriculture. <https://agriculture.kdsg.gov.ng/>
28. (2024). Kaduna State Special Agro Industrial Processing Zones Program. Kaduna State Special Agro Industrial Processing Zones Program. <https://kadsapz.ng/>
29. Iredia, T. (March 1, 2024). Constituency projects: Legislators manipulating Nigerians, by Tonnie Iredia. Vanguard News. <https://www.vanguardngr.com/2024/03/constituency-projects-legislators-manipulating-nigerians-by-tonnie-iredia/>

6.0 Policy Implications and Reform Options





The preceding analysis reveals systemic failures in Nigeria's multilevel trade governance. This section develops policy implications and presents reform options by intervention level and implementation complexity. Reforms range from actionable administrative changes to longer-term structural redesigns.

6.1 Redefining Subnational Roles in Export Facilitation

Current state roles focus on production capacity, infrastructure, training, and equipment subsidies. These interventions provide value but address only marginal constraints. States should reorient toward reducing transaction costs within their jurisdictions and systematic federal advocacy.

Recommended Role Shifts:

- **Export Navigator Programs:** States should establish dedicated export navigator services providing exporters with accurate federal regulatory information, documentation assistance, and problem resolution. Unlike clearing agents, whose incentives favour

complexity, navigators would be state employees with performance metrics tied to reducing transaction costs and time.

- **Checkpoint Elimination:** States should use their security authority to eliminate unofficial checkpoints on interstate highways. Coordinated action by governors through the Nigeria Governors' Forum could mandate that security agencies operate from fixed posts rather than mobile checkpoints, reducing corruption and transit times.
- **Last-Mile Infrastructure:** Rather than building export processing facilities with capacity without addressing bottlenecks, the Federal Government should invest in last-mile connectivity to ports and border crossings, access roads, truck parks, and

digital connectivity for remote documentation submission.

- **Federal Advocacy Units:** States should establish dedicated units within their investment agencies to advocate for federal policy reforms. These units would document how federal barriers affect state exporters, prepare evidence-based reform proposals, and engage systematically with federal ministries and National Assembly committees.

- **Regional Coordination:** States with similar export profiles should form regional export coalitions. Northern agricultural states (Kano, Kaduna, Katsina, and Jigawa) share common interests in facilitating agricultural exports. South-West manufacturing states (Lagos, Ogun, Oyo) face similar input duty constraints. Coordinated advocacy by state coalitions can carry more weight than individual state complaints.

6.2 Improving Intergovernmental Coordination

The absence of formal coordination mechanisms is the most fundamental institutional gap. Creating effective structures requires both institutional changes and operational reforms.

Immediate Actions (0-6 months)

1

Establish the Federal-State Trade Coordination Forum: A technical working group of the Federal Ministry of Industry, Trade and Investment, NEPC, NCS, and state commerce commissioners meeting quarterly. The forum would review pending policy changes, identify conflicts between federal and state initiatives, and develop coordinated implementation plans. This requires only executive action, not legislation.

2

Create State Liaison Offices at Major Ports: The proposal to establish state liaison desks at major ports such as Apapa, Tin Can Island, Port Harcourt, and Calabar should be considered carefully, as these structures may add bureaucracy and worsen existing inefficiencies. While improved coordination and real-time feedback for state-level exports are important, policy solutions should address the root causes of port challenges, such as procedural bottlenecks and regulatory overlaps. A more effective approach would be to pilot lean, time-bound coordination mechanisms, possibly using digital platforms, with clear accountability to ensure interventions address real gaps without adding complexity.

3

Implement Regulatory Impact Assessment for State Interests: Federal agencies should conduct impact assessments evaluating how proposed tariff changes, export bans, or regulatory modifications affect state export development programs. This consultation requirement, similar to environmental impact assessments, would require federal agencies to consider state perspectives before policy changes.

Medium-Term Reforms (6-24 months):

1

Establish the Subnational Council on Trade and Export Development: A formal intergovernmental body analogous to the Subnational Council on Health, comprising the federal trade minister and state commerce commissioners. The Council would meet biannually to set national export priorities, coordinate infrastructure investments, and resolve federal-state policy conflicts. This requires legislation by the National Assembly establishing the Council's legal authority.

2

Create a Federal-State Export Facilitation Fund: A jointly funded mechanism supporting interventions requiring federal-state cooperation, infrastructure connecting state production zones to federal ports, joint trade missions, and shared quality assurance facilities.

3

Develop Integrated Export Information Systems: A unified digital platform providing exporters with step-by-step guidance on federal and state requirements, tracking shipment status across agencies, and enabling electronic submission of documentation. The system would be jointly developed by the Federal Ministry of Industry, Trade and Investment (FMITI) and state investment agencies, creating technical infrastructure for coordination.

6.3 Policy Options for Tariff Relief and Exporter Support

Addressing tariff barriers requires federal action, but states can advocate for specific reforms and partner in implementation.

1

Priority Federal Reforms

Functional Duty Drawback Scheme: Nigeria has operated a duty drawback scheme since 2018, but implementation remains ineffective. Only 127 exporters utilised the scheme in 2023, versus over 15,000 active exporters.³⁰ Reform should:

- (a) shift from ex-post refund (requiring upfront payment) to ex-ante exemption (no payment for certified exporters)
- (b) Delegate processing to banks rather than customs, reducing bureaucracy, and
- (c) Expand eligibility to all export-oriented manufacturers, not just large firms.

30. (January 1, 2026). Nigeria's non-oil exports surge to historic high. African Business. <https://african.business/2026/01/trade-investment/nigerias-non-oil-exports-surge-to-historic-high>

2

Eliminate Export Duties on Raw Materials: The policy of export duties to encourage value addition has failed. States should advocate for the elimination of export duties on agricultural commodities and minerals, and for their replacement with production support for processors. This requires federal legislation, but states can build coalition support through documenting how duties harm their exporters without achieving processing objectives.

3

Rationalise Port Charges: Nigerian Ports Authority (NPA), terminal operators, and shipping lines impose numerous charges, often duplicating each other. The federal government should conduct a comprehensive audit of port charges, eliminate redundancies, and establish transparent fee schedules. States, especially Lagos, with Nigeria's busiest ports, should pressure federal authorities through their economic leverage and political influence.

6.4 Regulatory Harmonisation and Simplification

Agency multiplicity creates unacceptable complexity. Reforms should focus on consolidation, coordination, and digitisation.

1

Risk-Based Inspection Protocols: Only 5% of Nigerian exports receive risk-based treatment; 95% undergo physical inspection. NCS, SON, NAFDAC, and NAQS should adopt coordinated risk-based approaches that expedite clearance for certified exporters, low-risk products, and high-compliance firms. States can partner by certifying export facilities, reducing the federal inspection burden.

2

Recognise State Quality Certifications: Federal agencies should recognise quality certifications from accredited state facilities to eliminate duplicate testing. This requires federal-state cooperation on standards, but would significantly reduce costs and time. Ogun State's proposed food processing complex, for example, could include federally accredited laboratories serving multiple agencies.

3

Authorised Economic Operator Program: Expand Nigeria's Authorised Economic Operator (AEO) program, which currently covers only 43 firms. AEO certification should provide expedited customs clearance, reduced inspection frequency, simplified documentation, and designated processing lanes at ports. States should facilitate AEO certification for their priority exporters, working with NCS to streamline approval processes.

6.5 Strengthening Legislative Oversight and Advocacy

Federal legislators' limited engagement on state export interests is a missed opportunity for reform advocacy. Several interventions could activate legislative channels:

1

State-Legislature Trade Briefings: State governments should organise quarterly briefings for their National Assembly members to document export barriers affecting constituents. These briefings should present specific case studies, quantified impacts, and actionable legislative proposals. Currently, legislators receive general complaints; they need concrete evidence and ready-made solutions.

2

Model Legislation for State-Specific Trade Facilitation: States should develop model bills addressing their priority issues, such as duty drawback for agricultural exporters (northern states), input tariff reduction for manufacturers (south-west states), and streamlined mineral export procedures (north-central states). Model bills reduce the burden of legislative drafting and enable coordinated introduction by multiple legislators.

3

Constituent Engagement on Trade Issues: Export associations and businesses should actively engage their legislators to make export facilitation a constituent demand. Currently, trade policy remains technical and elite-focused. Broadening stakeholder engagement would create political incentives for legislative action.

4

Enhanced Committee Capacity: National Assembly committees on customs and trade lack technical secretariats providing independent analysis. The legislature should establish a Trade Policy Analysis Unit to provide committees with research support, comparative best practices, and impact assessments, enabling informed oversight of executive agencies.

6.6 Sequencing and Political Economy of Reforms

Reform sequencing matters. Some changes require only administrative action; others need legislation. Some face minimal opposition; others challenge powerful interests. Successful reform should follow this order:



Phase 1 (0-6 months)

Quick Wins
Establish a coordination forum, create port liaison offices, and implement regulatory impact assessment for state interests. These require only executive action and face limited opposition. Early wins build momentum for harder reforms.



Phase 2 (6-18 months)

Institutional Foundations
Establish the National Council on Trade, develop integrated information systems, and expand the AEO program. These build institutional capacity for deeper reforms while demonstrating commitment.



Phase 3 (18-36 months)

Structural Reforms
Reform duty drawback, eliminate export duties, rationalise port charges, and implement risk-based inspections. These face opposition from revenue-dependent agencies and rent-seeking actors. Success requires sustained political commitment and coalition-building through Phases 1 and 2.

Political economy challenges are substantial. NCS resists reforms, reducing revenue. Clearing agents oppose simplification, as it threatens their business model. Some legislators benefit from complex procedures, creating opportunities for constituent services. Port terminal operators profit from delays, charging demurrage. Successful reform requires building countercoalitions of exporters, state governments, and development partners while addressing the legitimate concerns of those facing disruption.

7.0 Conclusion





7.1 Summary of Key Findings

This study examined the paradox of expanding subnational trade promotion alongside persistent high tariffs and export constraints in Nigeria. The research shows this paradox stems from fundamental misalignment in Nigeria's multilevel trade governance, not implementation failures or resource constraints.

Despite states investing N128 billion in trade promotion infrastructure (2020-2024),³¹ establishing 28 investment agencies, 14 special economic zones, and organising over 180 trade missions, Nigeria's export performance has deteriorated. Export processing times increased from 21 to 26 days, documentary compliance costs rose 34%, and the country's Trading Across Borders ranking fell from 179th to 183rd globally. Non-oil exports stagnated below \$15 billion annually while regional competitors saw robust growth.

Three interconnected gaps explain this outcome. First, jurisdictional mismatches mean states invest in production capacity while the federal government controls

transaction costs at the export stage. States build facilities and train exporters, but these investments are undermined by federal tariff structures, customs procedures, and regulatory barriers beyond state influence. Second, institutional coordination failures leave federal agencies operating without state input while states design programs without federal coordination. No formal mechanisms exist for resolving conflicts between federal policy and state priorities. Third, federal legislators rarely advocate for state-specific trade reforms, leaving state priorities without a voice in federal policy processes.

Exporter experiences documented through key informant interviews reveal how these structural problems manifest in practice. Exporters universally acknowledge state support but identify federal barriers as binding constraints. Effective tariff rates of 30-45% (versus nominal rates of 12.1%), 17 federal agencies requiring 23 procedural steps, port dwell times of 18-23 days, and unofficial payments averaging N85,000 per shipment collectively negate the impact of state-level investments. States address 30-40% of export challenges, while the federal government controls the remaining 60-70%.

31. Isa, A. (August 7, 2020). NIPC: 26 states've investment promotion outlets. *New Telegraph*. <https://newtelegraphng.com/nipc-26-statesve-investment-promotion-outlets/>

7.2 Implications for Nigeria's Export Competitiveness

The persistence of high export barriers despite expanding subnational activism has profound implications for Nigeria's economic future.

First, it represents major resource misallocation. States invest billions in export infrastructure with minimal returns because federal-level constraints remain unaddressed. The World Bank estimates that reducing trade costs to regional averages could increase non-oil exports 42% and create 3.2 million jobs.³² This foregone growth represents a development tragedy given Nigeria's youth unemployment crisis and need for economic diversification.

Third, it undermines Nigeria's positioning in the continental trade architecture. AfCFTA implementation requires competitive exports, but Nigerian exporters face cost disadvantages even within West Africa. Ghana, with one-sixth of Nigeria's population, exports more non-oil products. Kenya achieves a higher per capita export performance despite a smaller economy.³³ Without addressing institutional barriers, AfCFTA becomes another missed opportunity.

Fourth, the current system entrenches inequality across states. Lagos captures 65-70% of FDI due to superior infrastructure and port proximity. This geographic concentration occurs partly because federal trade barriers make interior locations even more disadvantageous, adding transport costs to already high export costs. Better federal-state coordination could enable interior states to leverage comparative advantages in agriculture and mineral production.

7.3 Directions for Future Policy and Research

This research points to several policy and research directions. Policy-wise, Nigeria requires fundamental rethinking of multilevel trade governance. Piecemeal reforms such as automating customs documentation, expanding one-stop-shops, and organizing more trade missions provide only marginal benefits while leaving structural problems intact. Effective reform demands:

- Creating formal coordination mechanisms (National Council on Trade and Export Development) institutionalizing federal-state cooperation;
- Empowering states to influence federal trade policy through mandatory consultation requirements and regulatory impact assessments;
- Rationalising regulatory requirements and implementing true single-window systems with backend agency integration; and
- Activating legislative advocacy through state-legislature coordination and strengthening the National Assembly committee capacity.

Research directions may include assessment of comparative analysis of multilevel trade governance in other federal systems (India, Brazil, Ethiopia, South Africa) and the identification of institutional arrangements that enable effective federal-state cooperation. Quantitative research estimating the specific impacts of different barriers would support prioritised reform: which constraints most affect export volumes, and which reforms generate the highest returns. Sectoral studies examining how institutional gaps manifest differently across agricultural exports, manufactured goods, and services would enable targeted interventions.

32. (2011, January 18). *Sustaining the Recovery and Looking Beyond the Middle East and North Africa Region A Regional Economic Developments and Prospects Report*, January 2011. World Bank. Retrieved March 18, 2026, from <https://documents1.worldbank.org/curated/en/700381468052158171/pdf/599600v20REVIS10BOX358307B01PUBLIC1.pdf>

33. (2026, January 5). *Ghana Economic Outlook*. African Development Bank. Retrieved March 22, 2026, from [https://www.afdb.org/en/countries/west-africa/ghana/ghana-economic-outlook#:~:text=According%20to%20the%20African%20Economic%20Outlook%20\(AEO\),1.9%25%20in%202024%20and%202.3%25%20in%202025](https://www.afdb.org/en/countries/west-africa/ghana/ghana-economic-outlook#:~:text=According%20to%20the%20African%20Economic%20Outlook%20(AEO),1.9%25%20in%202024%20and%202.3%25%20in%202025)

Political economy research is needed on coalition-building for reform. Why have exporters failed to mobilize politically despite clear interests? What explains federal legislators' limited advocacy for constituent states? How can reform coalitions overcome resistance from rent-seeking actors? Understanding these dynamics is essential to translate technical recommendations into political reality.

Finally, implementation research should track pilot reforms. Several states and federal agencies are experimenting with coordination mechanisms, digital documentation systems, and streamlined procedures. Rigorous evaluation of these pilots—what works, what fails, and why—can generate evidence to guide scaled implementation journey.

8.0 Recommendations





1

Establish a Federal-State Trade Coordination Forum to hold quarterly meetings among FMITI, NEPC, NCS, and state commerce commissioners. The Forum will review policy changes, resolve conflicts, and develop coordinated plans, with the Secretariat based at FMITI.



2

Create State Liaison Offices at major ports, including Apapa, Tin Can, Port Harcourt, and Calabar. The Nigeria Customs Service will establish dedicated liaison desks at these locations, staffed by 2–3 officers, to expedite clearances for state-priority exports.



3

Implement Regulatory Impact Assessments requiring federal agencies to evaluate how proposed policy changes affect state export programs and circulate the assessments to affected states for comment before implementation.



4

Expand the Authorised Economic Operator (AEO) program by increasing certified firms to at least 500 within six months. Allow states to conduct preliminary certification, with the federal government responsible for auditing and monitoring. Offer benefits such as 48-hour clearance guarantees, reduced inspection frequency, and dedicated processing lanes.



5

Direct the Nigerian Export Promotion Council to publish a comprehensive export procedures manual detailing all federal agency requirements by product category. Ensure the manual is regularly updated and available in both print and digital formats, including contact information, processing times, fee schedules, and appeals procedures. certified exporters import inputs duty-free upon posting a bond, with states pre-certifying export readiness, banks processing documentation, and customs conducting post-clearance audits.



6

Implement a Manufacturing-Under-Bond scheme that allows certified export manufacturers to import machinery and raw materials duty-free, provided at least 70 percent of output is exported. States will identify and certify manufacturers, while the federal government will monitor and audit compliance.



7

Deploy an Integrated Export Documentation System using a unified digital platform. Exporters will submit documentation once, which will be automatically routed to relevant agencies. The system will feature backend integration for automated approvals and a shipment-tracking dashboard. Begin with pilot implementation at two ports before expanding nationwide.



8

Adopt coordinated risk-based inspection protocols among the Nigeria Customs Service, Standards Organisation of Nigeria, National Agency for Food and Drug Administration and Control, and Nigeria Agricultural Quarantine Service. Compliant firms and low-risk shipments will receive documentary review, while only a small proportion will undergo random physical inspections. Intensive inspections will be reserved for high-risk transactions.



9

Rationalise port charges by conducting a comprehensive audit to identify redundant or unjustified fees. Consolidate charges where possible, publish transparent fee schedules with justifications, and establish independent price regulation for Nigerian Ports Authority charges.



10

Recognise state quality certifications by allowing federal agencies to accept certifications from state-accredited laboratories that meet federal standards. The Federal Ministry of Industry, Trade and Investment will develop an accreditation framework, and federal agencies will conduct periodic audits.



11

Establish a National Council on Trade and Export Development through legislation creating a formal intergovernmental body comprising the federal trade minister and state commerce commissioners that meets regularly to set export priorities, coordinate investments, and resolve policy conflicts.

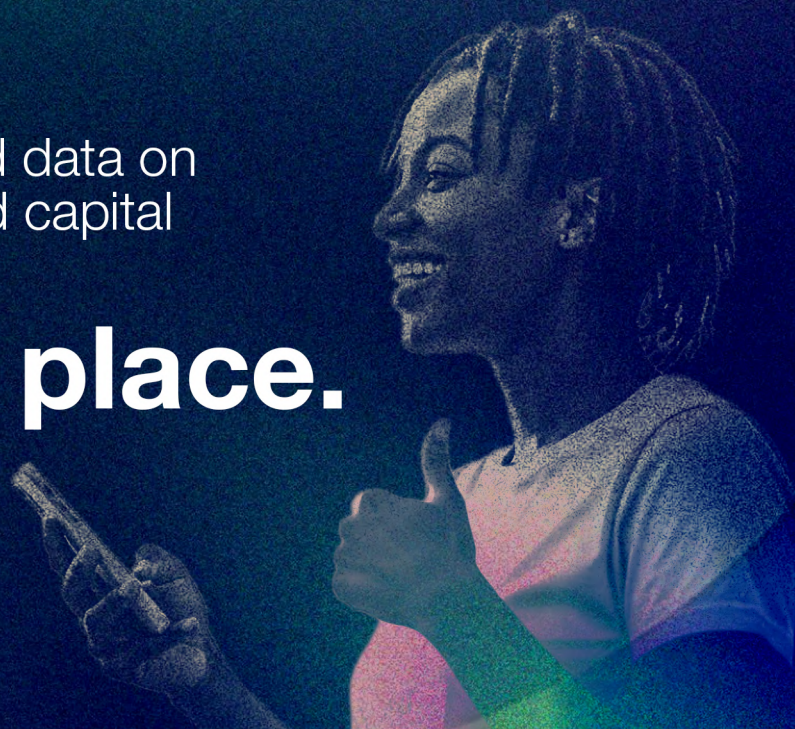


12

Restructure the Nigeria Customs Service by separating revenue collection and trade facilitation functions into distinct operational divisions with separate performance metrics and establishing a dedicated Export Facilitation Division focused on supporting exporters.

Access disaggregated data on federal allocations and capital projects

all in one place.



The dashboard interface includes a navigation bar with links for 'About Us', 'Budget Access', 'Focus Area', 'Infographics', 'Publications', 'Updates', 'NG', and a 'Donate' button. The main content area features filters for 'FEDERAL GOVERNMENT OF NIGERIA APPROVED BUDGET', 'Budget Year' (2024), 'Mother Ministry' (All), and 'Ministeries, Departments and Agencies (MDAs)' (All). A 'DOWNLOAD BUDGET' button is also present.

Key budget figures are displayed in a row of five cards:

- ₦28.77tn** TOTAL ALLOCATION
- ₦7.02tn** PERSONNEL COST
- ₦9.88tn** OVERHEAD COST
- ₦8.50tn** CAPITAL EXPENDITURE
- ₦3.37tn** GOEs & STATUTORY TRANSFERS

A 'TOTAL EXPENDITURE BREAKDOWN' section shows a horizontal bar chart with the following data:

Category	Amount
INTEREST - INTERNAL PUBLIC DEBT	₦5,299,703M
ACQUISITION OF NON TANGIBLE ASSETS	₦4,107,262M
SALARIES AND WAGES	₦3,966,067M
CONSTRUCTION / PROVISION OF FIXED ASSETS - GENERAL	₦3,169,060M

A dashboard that provides an interactive view of how government resources are distributed, spent, and implemented across ministries, departments, and agencies.

Follow the money on

budgit.org/fg-budget-dashboard/

