NIGERIA'S ENERGY SITUATION

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INTRODUCTION

Nigeria with a population of 180 million people has only an average of about 4000MW of electricity available for distribution, a quantity insufficient for the 57% of the population that is on the grid. This means that only 25% of those on the grid get up to four hours of electricity daily, while about 76 million people are without access to electricity.

With a population growth rate of 2.6% per annum, Nigeria is estimated to have a population size of about 264 million people by 2050. This further means that the already badly over-burdened energy systems will be stretched to meet the needs of this burgeoning population, the bulk of whom would not have energy access as the grid expansion cannot keep pace with the country's population growth.

Although self-generation is estimated to be as high as 13,000MW by the manufacturers alone, it is almost entirely through fossil-fuel generators which are polluting, inefficient and expensive. This does not take into account self-generation by non-manufacturing businesses of all sizes as well as residential homes.

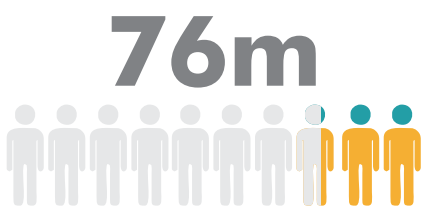
It is in recognition of this limitation that there has been a greater shift towards off-grid power generation, especially through the use of renewable energy sources to provide energy access to the un-electrified population who are mostly in rural and peri-urban areas.

These off-grid electricity sources range from pico-solar solutions (e.g. solar lamps and lanterns), solar home systems, and mini-grids which can be powered by solar, biomass or even a hybrid form of energy.

Off-grid electricity holds significant advantages over grid-connected electricity. It is cheaper to deploy off-grid electricity than grid electricity – for instance, a mini-grid can be designed and installed within an average time of nine months, while comparatively, it takes an average of nine years to build a grid-connected power plant. A significant advantage of Off Grid systems is that they can be deployed at the exact point of need, and do not need expensive transmission connections. They are also cheaper to deploy than grid based connections; whilst off-grid energy sources are less polluting than grid-connected plants.

To encourage the generation and use of renewable energy in general and off-grid renewable energy specifically, the Nigerian government has defined renewable energy generation targets, and has put in place policies and incentives to encourage investments in the off-grid sector. These target include the generating of up to 9000MW from renewable energy by the year 2030; the deployment of 10,000 mini-grids by 2023; the enactment of policies such as the National Renewable Energy and Energy Efficiency Plan (NREEP), the Rural Electrification Strategy Implementation Plan (RESIP), the Mini-Grids Regulations; and the operationalization of the Rural Electrification Fund (REF) to provide grants for the deployment of mini-grids and solar home systems for rural communities.

The inadequate supply of electricity has also severely impacted businesses in Nigeria, forcing them to self-generate, which significantly raises their operating costs and reduces their profitability and competitiveness.



about 76 million people are without access to electricity.

In a survey of micro, small and medium-scale enterprises (MSMEs) by the National Bureau of Statistics (NBS), poor infrastructure (of which electricity was considered the most significant) was identified as amongst the top 3 challenges. It was also identified as one of the three priority areas of assistance needed by the MSMEs.

The objective of this policy brief is to examine the above energy policies and regulations with respect to its stated goals, and objectives as well as the short, medium and long-term targets of achieving energy access and democratizing electricity access for all Nigerians through the recent incursion into off-grid decentralized renewable energy sources.

This policy brief will also examine how clean and sustainable energy solutions can be deployed for economic development targeting MSMEs. This is very critical towards improving the competitiveness of MSMEs which as a whole contribute 48.47% to the National Gross Domestic Period, 7.27% of exports and employ 59,741,211, and overall representing 84.02% of the total labour force.

This policy brief will also assist policymakers at the national and sub-national levels on how to improve and design energy policies and targets, as well as how to increase access to energy for MSMEs using clean, sustainable energy solutions.

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A CONTINENTAL OVERVIEW: AFRICA'S ENERGY REALITY

Unreliable power is still a major problem in many Sub-Saharan African countries. Almost 600 million people across Sub-Saharan Africa lack access to electricity at home. Only seven countries on the continent – Cameroon, Cote d'Ivoire, Gabon, Ghana, Namibia, Senegal and South Africa have a household electricity access rate beyond 50 percent with the average grid access rate of just 20 percent.

While this situation greatly affects households, problems of electricity cost and reliability for commercial and industrial activities has greatly affected job creation, economic productivity, and income growth. For instance, in a great number of African countries, petrol and diesel generators are employed to power businesses. These have negatively impacted the profitability of small scale businesses and industries and limited the economic and social growths in these countries.

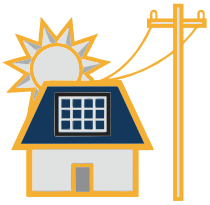
For most Africans, electric power is inaccessible, expensive or where access exists, it is grossly unreliable. The inaccessibility of modern energy in most Sub-Saharan Africa countries affects all sectors of the society.

Presently, the current energy demand sector of the continent far outstrips supply and has failed to the meet the needs of many Africans. Furthermore, with the population growth across the continent projected to grow faster than electrification efforts, the problem appears dire and its impact on human development can be felt across several indicators.

Based on current trends, while electrification rates will grow from 35 to 51 percent, the number of people still without energy access is projected to hit 645 million by 2030. A number of African countries have recognized the need to accelerate electrification and are now looking at the adoption of renewable and sustainable energy.

Countries such as Kenya and Tanzania have added hundreds of Megawatts using off-grid renewable energy solutions.

Almost every country across the continent also has off-grid renewable energy expansion plans – to mention a few examples: Kenya is aiming to achieve universal (100%) electrification by 2022 using off-grid renewable energy; Rwanda aims to install 296MW by 2024 to achieve universal electrification, with 48% of it from off-grid renewable energy and Ethiopia has a target of connecting 35% of its unconnected population to be served by off-grid renewable energy solutions in order its goal of universal electrification by 2025.



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AN OVERVIEW OF THE NIGERIA ENERGY POLICY LANDSCAPE

Nigeria's electricity sector has existed and evolved over its 100years existence with the first electricity generation in 1896 under the colonial rule in Ijora, Lagos with two (2) generating sets of 30kW installed to provide electricity to the then Colony of Lagos.Electricity supply then commenced in 1929 with the establishment of the Nigeria Electricity Supply Company (NESCO) an electricity utility company operating a hydroelectric power station near Jos, Plateau State.

However, deliberate energy policymaking in Nigeria started with the establishment of Electricity Corporation of Nigeria (ECN) in 1951 to handle issues of electrification across the country. Prior to the establishment of the ECN, electricity development was in form of individual electricity power undertaking scattered all over the towns either with the Federal Government bodies under the Public Works Department and some by the Native Authorities and others by the Municipal Authorities.

The National Electric Power Authority (NEPA) was established in 1972 to enable a more effective management of the power sector in the country when Electricity Commission of Nigeria (ECN) and the Niger Dam Authority (NDA) – (established in 1962) with a mandate to develop the hydro-power sub-sector.

Since then, there has been sporadic incremental growth in the country's electricity infrastructure and until the early 2000s, very little changes in both the nomenclature and operations of her associated departments and agencies.

As Nigeria transited to a democracy in 1999, the Federal Government began reforms in the power sector starting with the adoption of the National Energy Policy in 2003 with the objective of optimal utilization of the nation's energy resources for sustainable development.

This was followed by the enactment of the Electricity Sector and Power Reform Act (ESPRA 2005) as the legal framework for the unbundling of the existing electricity architecture under the PHCN and in order to transit the sector from being publicly-run to being privately-run in order to attract investments with the objective of meeting the energy demand of the country.

The unbundling of the defunct National Electric Power Authority (NEPA) into the Power Holding Company of Nigeria (PHCN) created nine generation companies, one transmission company and eleven distribution companies – these were subsequently privatized except for the transmission company. This was a crucial first step towards achieving the objective of a market-driven sector.

The enactment of the EPSRA has also kick started a flurry of new policies and regulations aimed at growing the sector, and also created numerous government organizations in the electricity sector

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such as the Nigerian Electricity Regulatory Commission (NERC) as the industry regulator; the National Bulk Electricity Trader (NBET) in charge of buying power from generating companies and selling to the grid; the Nigeria Electricity Liability Management Company (NELMCO) to assume the non-core assets and liabilities of the successor companies of PHCN in order to remove such encumbrances and boost investor confidence; the Rural Electrification Agency (REA) to drive rural electrification in the country; and the Nigerian Electricity Management Services Agency (NEMSA) to ensure all equipment used in power installations are tested and certified as fit for use.

The NERC has developed regulations such as the Embedded Power Generation Regulations (which allow distribution companies to buy power from generators in their network without it passing through the transmission grid), the Captive Power Generation Regulations (for off-grid power producers exceeding 1MW and serving a single customer);the Independent Electricity Distribution Networks Regulations (which allows for off-grid networks or can be embedded into a distribution network) and the Regulation on Local Content Development for the Power Sector enacted in 2014, and with its implementation plan launched in 2019 – with the aim to develop local content in the Nigerian power sector.

Also, the Federal Government has set out various policies to encourage renewable energy generation and energy efficiency in Nigeria, specifically the National Renewable Energy and Energy Efficiency Policy (NREEEP). Key aspects of the policy include defining targets, objectives and strategies for the different renewable energy sources; emphasizing the need for off-grid renewable energy generation; feed-in tariffs and special customs clearance for renewable energy and energy efficiency equipment.

The policy is backed by the National Renewable Energy Action Plan (NREAP) and the National Energy Efficiency Action Plan (NEEAP), which are both 15-year plans designed to achieve the objectives of the earlier mentioned National Renewable Energy and Energy Efficiency Plan. These plans have defined targets, standards, and organizational responsibilities for different tasks in the implementation plans, timelines and financing mechanisms for the various activities and targets.

The current overarching policy of the Federal Government for renewable energy generation is the 30-30-30 Policy which aims to generate 30% of 30GW (9GW) from renewable energy by the year 2030. This aligns with the Paris Climate Accord which Nigeria is a signatory to, and to which she has pledged to not exceed carbon emissions above limits detailed in the Nationally Determined Contributions. It also aligns with the SE4ALLframework which seeks to achieve Goal 7 of the Sustainable Development Goals, which is Affordable and Clean Energy for all by 2030.

There have also been numerous regulations developed by NERC related to renewable energy, with the most significant of this being the Mini-Grid Regulations which were released in June 2017. The regulations classify mini-grids into isolated mini-grids (those in areas without any grid connections) and interconnected mini-grids (those in areas with grid connections), and further defines how tariffs are to be calculated and offers protections for communities that will have mini-grids.

There are also other regulations such as Feed-In Tariffs Regulations in order to encourage greater private sector participation in renewable energy generation, encourage private investors to run their plants more prudently and efficiently, provide priority access to the grid for renewable energy and establish a guaranteed price for electricity generated from renewables for a fixed period to provide stable income and an adequate return on investment.

Although regulations such as Embedded Power Generation and the Captive Power Generation are not solely specific to the renewable energy sector, they can be leveraged upon to increase renewable energy investments and generation for specific sub-sectors. The Embedded Power Generation Regulations will

encourage private investors to set up renewable energy power plants which are too large for mini-grids (exceeding 1MW) and sell directly to distribution companies rather than to the grid, thus reducing power losses from transmitting over long distances.

The Captive Power Generation Regulations on the other hand, will encourage companies to invest in large power plants using renewable energy and be able to sell the surplus to a distribution company – this is important as more companies in Nigeria are investing in solar plants (referred to as Commercial and Industrial Solar) to power their businesses.

There is also the Eligible Customer Declaration Policy recently passed and invoked by the Minister of Power in 2017, which allows generating companies and the transmission grid to sell power directly to large power consumers and has the capacity to create opportunities for distribution companies to invest in embedded generation using renewable energy in order to offset the loss of power sold directly to the large customers under the Eligible Customer Declaration Policy in their domains..

CLEAN ENERGY OPTIONS FOR MSMES IN NIGERIA

The National Policy on MSMEs classifies MSMEs into three categories based on criteria, employment and assets (excluding land and buildings). If there exists a conflict on classification between employment and assets criteria (for example, if an enterprise has assets worth seven million naira (N7M) but employs 7 persons), the employment-based classification will take precedence and the enterprise would be regarded as a micro-enterprise. This classification is detailed and described in detail in the table below.

S/N	Size Category	Employment	Assets (=N= Million) (excl. land and buildings)
1	Micro enterprises	Less than 10	Less than 5
2	Small enterprises	10 to 49	5 to less than 50
3	Medium enterprises	50 to 199	50 to less than 500

MSME Classification according to the National Policy on MSMEs

A survey by the Small and Medium Enterprises Development Agency of Nigeria (SMEDAN) and the National Bureau of Statistics (NBS) in 2013 put the number of MSMEs as over 37million (Micro-36,994,578, Small- 68,168, and Medium- 4,670) enterprises in Nigeria and that they account for more than 84 per cent of jobs in the country.

The survey also found out that MSMEs also account for about 48.5 per cent of the country's gross domestic product (GDP) and about 7.27 per cent of goods and services exported out of the country. Contribution of MSMEs to the GDP is broken into three economic sectors. That includes Services accounting for 45.72% of total; followed by Agriculture with 42.02% and Industry accounting for 12.26%.

This clearly shows that MSMEs are key drivers of socio-economic development in Nigeria and must be put at the forefront of economic policies. This is because MSMEs stimulate job creation, increase exportation of goods, local value addition and technological advancement.

Furthermore, MSMEs offer greater opportunities for economic participation for those without formal education and for women – 3.6% of people in small and medium enterprises and 20% of people in micro enterprises have no education while female entrepreneurs accounted for 43.32% in the ownership structure of micro enterprises and 22.75% in small and medium enterprises.

MSMEs are key drivers of socio-economic development in Nigeria and must be put at the forefront of economic policies.

Key characteristics of these small businesses include little capital outlay, minimal fixed assets, highly localized in the area of operation, greater use of local raw materials, simplified record keeping, and often with unsophisticated management structure.

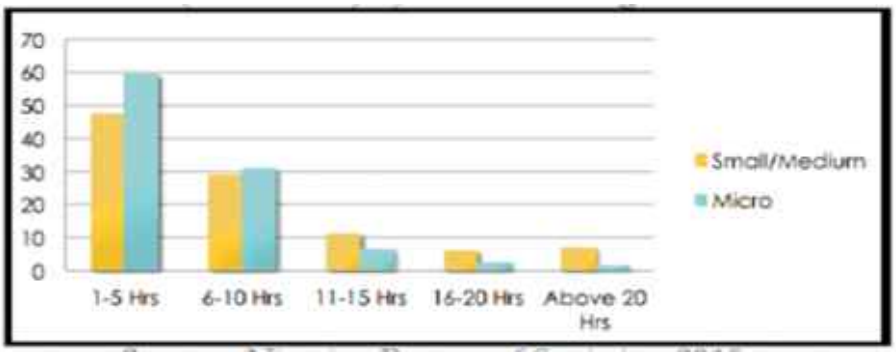
MSMEs source capital from various traditional means including personal saving, family source, loan,

cooperative, and grants. Over 60% of MSMEs use personal saving to start up their businesses.

Beyond personal savings (which accounts for large portion of MSMEs capital source), Micro enterprises mostly rely on family source and local cooperatives, whereas Small and Medium are more likely to access loans from formal sources. Due to their low capital holding or source of capital, MSMEs are mostly uninsured.

Available data show that 94.61% of micro enterprises are uninsured while 65.16% of SMEs are uninsured. However, MSMEs in Nigeria are beset by numerous problems such as access to finance, weak infrastructure (including power supply), inconsistency of government policies, multiple taxation, interest rates, trade permits, demolition of business place and obsolete technology among other issues. The survey by SMEDAN and NBS identifies power supply as the most significant challenge for MSMEs as they need regular electricity to drive business activities.

This can be clearly seen from the figure below which shows how they rely on alternative sources of power supply daily, which are typically petrol or diesel-powered generators.



Daily use of Alternative Source of Power (Generators) by MSMEs in Nigeria

However, there are numerous energy options for micro, small and medium-scale enterprises (MSMEs) in Nigeria that will solve the challenge of perennial lack of power supply. These options are not just clean as they are powered by renewable energy, but are cheaper than diesel and petrol generators.

These energy options include:

- Mini-grids

Mini-grids are an excellent energy option for MSMEs, particularly when they are located in a cluster. This eliminates their energy costs using fossil-fuel generators as the mini-grid bills are far cheaper. It also improves working conditions around the industrial clusters through the elimination of noise and toxic fumes from the generators. This has been piloted successfully by the Rural Electrification Agency's Energizing Economies Program through which mini-grids were deployed in four markets across the country – Ariaria Market (Aba, Abia State), Sura Ultramodern Complex (Lagos State) and Sabon Gari Market (Kano State) with the elimination of tens of thousands of small petrol-powered generators. The program intends to deploy these mini-grids in 340 identified economic clusters over the next 4 years of the project. These mini-grids provide excellent opportunities for investors as the economic activity in these clusters as well as existing use of more expensive alternatives prove that the beneficiaries have the ability to pay. It also expands the policy options for governments at federal and state levels in solving power supply for MSMEs which will improve their

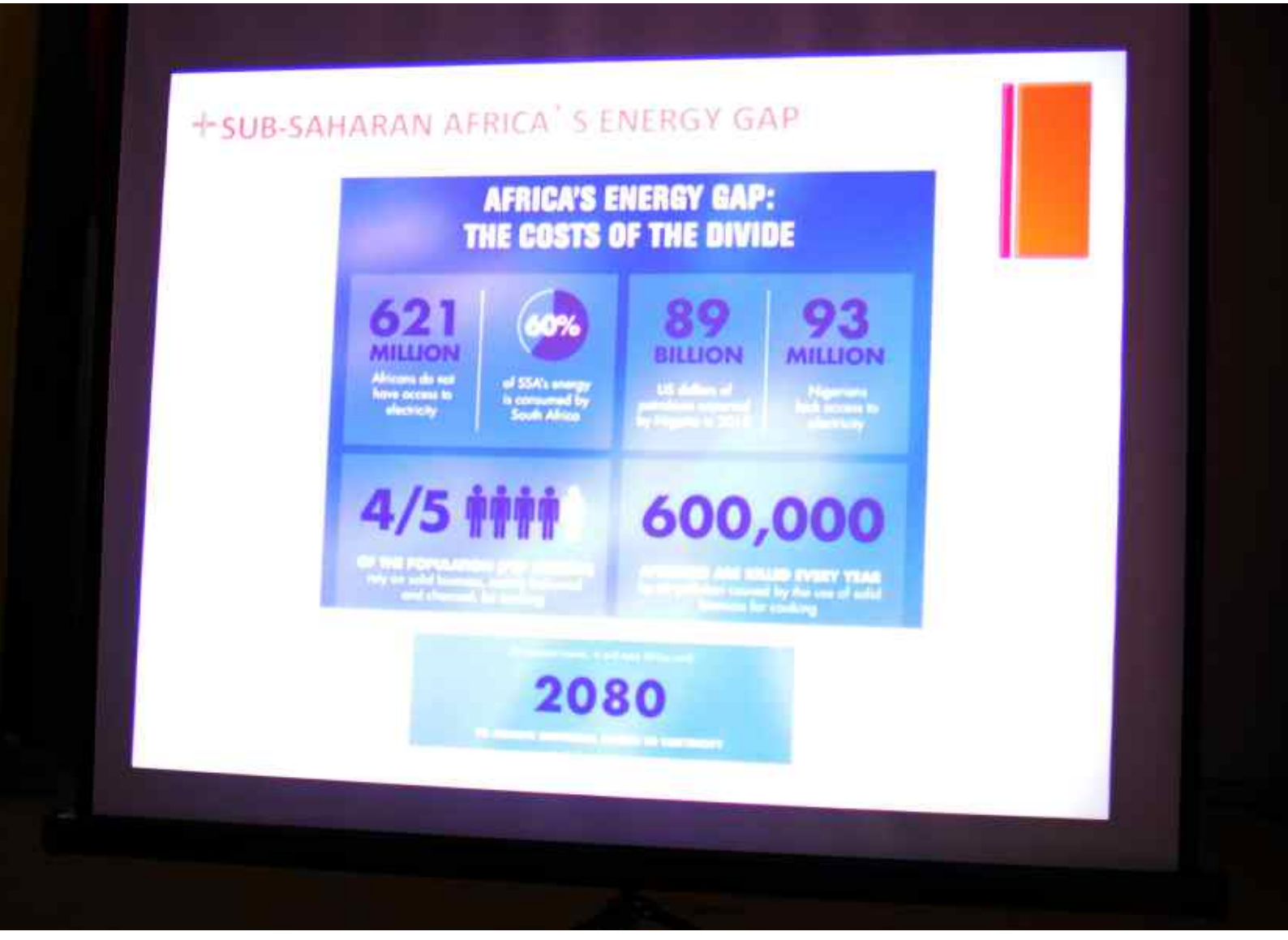
competitiveness.

- Solar Standalone Systems:

Solar stand-alone systems (or rooftop solar) are an energy option for MSMEs who have the proven ability to pay and are desirous of reducing their energy costs from the use of fossil-fuel generators. They are especially suitable for small and medium-scale businesses that are not located in a cluster (thus making it difficult to benefit from a mini-grid targeting MSMEs). The Rural Electrification Agency through the Rural Electrification Fund provides grants for the deployment of solar standalone systems in rural areas.

- Solar Home Systems:

These are excellent energy options particularly for micro-enterprises with low power needs. These systems provide mostly lighting, phone charging and could be able to power other appliances such as television sets, fans, etc. There is evidence that shows that the micro-enterprises that use solar home systems are able to be open for longer hours into the night and work in better conditions, allowing them to earn more income from increased business. The Federal Government has through the Niger-Delta Power Holding Company has funded the deployment of 20,000 solar home systems to off-grid households under a Presidential Initiative for Solar Home Systems.



CHALLENGES TO ENERGY ACCESS IN NIGERIA

In achieving success in the development of renewable energy in Nigeria, some obstacles have been identified, but it is however not easy to identify a single factor that can have a long positive impact on the development of renewables.

Some of the main barriers to the development of renewable energy in the country includes; access to finance (financial investment), fiscal incentives, standardization, lack of technical capacity, low level of awareness among others.

Policy and Regulatory Barriers:

Although the Federal Government has developed numerous policies and regulations specifically for renewable energy, the growth of the sector is still beset by other policies, particularly those developed by government ministries and agencies that are outside the energy sector.

A key example is the imposition of import duties of up to 10% on renewable energy products and equipment, which was developed by the Federal Ministry of Finance and implemented by the Nigerian Customs Service. This policy has increased the cost of renewable energy generation and is in direct contradiction of all existing policies and plans on increasing renewable energy generation in Nigeria.

Financing and Investment Barriers:

Renewable energy projects are extremely costly and capital-intensive and require huge capital outlay and financial resources for their effective implementation and execution.

This therefore means that absence of a regular cash flow and consistent financing options for such investment projects constitute a barrier to the development of such projects. The advocates of renewable energy technology face the problems of high transaction costs and restricted access to capital.

On the other hand, the end users of these solutions, especially the poor, face problems of access to credit to own these products.

- Certification and Standardization Barriers:

The local competence and capacity to determine the right quality and standards for renewable energy products and the lack of certification for technical skilled personnel in the country remains a major worry for the renewable energy sector.

This has resulted in poor quality renewable energy products flooding the market as well as poor quality installations and services, thus negatively affecting the perception of renewable energy in Nigeria.

- Limited Public Awareness:

Most Nigerians are still accustomed to the conventional energy sources and there is little or limited public knowledge about the potentials, benefits and relative affordability of renewable energy solutions and projects in Nigeria. Inadequate awareness of the immense potential of these projects has resulted in little effort being made into tapping its huge potential. This lack of information and awareness creates a market gap that results in higher risk perception for potential renewable energy projects.

POLICY RECOMMENDATIONS

As can been seen from the foregoing - Nigerian has a robust policy and regulatory landscape starting from the laws setting up the defunct Electricity Commission of Nigeria (ECN) to the current most notable regulation – the 2016 Mini Grid regulation launched in 2017. Yet, with this deluge of laws, policies and regulations, the country's energy access remains poor and some might argue intractable. At the core of the problem – is the lack of implementation and historically a lack of commercial framework to run the country's electricity industry. This is why the new focus of the electricity administrators in Nigeria- in using Off-Grid renewables to increase access is a laudable one. There must be a corresponding effort to also increase access to clean energy for MSMEs in Nigeria to ensure uptake and reduce wastage in the renewable energy systems. When electricity is employed for productive use, it grows the economy and creates jobs. Therefore, the following policies are recommended for the Federal Government and for state governments to increase energy access for SMSEs:

Federal Government

- Removal of import duties on renewable energy equipment: The imposition of import duties on renewable energy equipment increases the cost of acquiring clean energy options as the suppliers pass the cost to the end-users. The removal of the import duties will reduce the cost of renewable energy systems, allowing more MSMEs to access clean energy, whether through a solar home system, stand-alone solar or a mini-grid.

- Removal of fuel subsidies: Although fuel subsidies are intended to increase access to energy for the poorer members of society, ample research has shown that it is inefficient in how it is distributed with the poorest 20% of the Nigerian society receiving just 13% of the subsidy. It also takes up a disproportionate share of government spending and the inefficiencies in distribution and the effects of product diversion increase the prices of the fuels beyond the official prices. Most importantly, fuel subsidies distort the market for clean energy alternatives by making them seem artificially expensive in comparison to dirty fuels.

- Increase subsidies for clean energy options, especially targeting economic clusters: The Federal Government through the Rural Electrification Fund of the Rural Electrification Agency is issuing grants to developers of mini-grids and solar home systems in order to subsidize their development and deployment. We recommend that the Federal Government increases the grants and with a focus on economic clusters or how they can be deployed for productive-use by targeting MSMEs.

- Carry out deliberate public awareness on the benefits of using renewable energy: The Federal Government should carry out public awareness campaigns on the benefits of using renewable energy, especially when compared against fossil-fuel alternatives. This can be done through the National Orientation Agency (NOA) or through the relevant ministries and agencies in amplifying the efforts of the government in renewable energy projects such as the Energizing Education and Energizing Economies Initiatives of the Rural Electrification Agency, or the Presidential Initiative for Solar Home Systems.

- Create deliberate policy for developing product standards and skilled personnel: In order to make the renewable energy sector resilient and its growth sustainable, it is imperative that the Federal Government develop product standards and enforce them through the Standards Organization of Nigeria (SON); and develop curriculum for

capacity development for skilled technical personnel through the Federal Ministry of Education, the National University Commission and the National Board for Technical Education (NBTE).

- Provide incentives for companies using renewable energy as power source: The Federal Government should provide incentives for companies whose power is sourced from renewable energy, which can be based on their sizes. Large renewable energy consumers can be given carbon credits, which is a permit which allows a country or organization to produce a certain amount of carbon emissions and which can be traded if the full allowance is not used. Low-cost financing can be offered to MSMEs who intend to deploy renewable energy to grow their businesses.

- Providing Low Cost Financing Schemes for Renewable Energy: Although there are development funds that exist for renewable energy development such as the Rural Electrification Fund and donor grants such as from the Nigerian Energy Support Programme of the German International Development Agency and the United States Agency for International Development (USAID), they are targeted mostly at large-scale deployments such as mini-grids. A fund in the mold of the Bank of Industry Solar Fund can be created wholly dedicated to low-cost financing for MSMEs to deploy renewable energy technologies. Additionally, the MSME Development Fund of the Central Bank of Nigeria can also be directed for this purpose.

- Align renewable energy to other growing ecosystems: The Federal Government should create a policy to have facilities in other ecosystems such as health and education to be powered by renewable energy. This will encourage more investment in such facilities especially in off-grid areas (which are often rural and peri-urban), increase awareness and acceptance of renewable energy, and spur the adoption of renewable solutions by host and neighboring communities. It will also increase the service delivery of these facilities.

State Governments

- Domicile policies and laws to attract private sector investment into clean energy in their states: A lot of work has been done at the federal level in developing policies, laws, action plans and regulations to increase renewable energy investments in Nigeria. However, very few states have domiciled similar policies and laws to attract these investments into their domains, which could be instrumental in increasing access to clean energy especially through mini-grids. State governments can also create investment briefs to woo these developers to site their projects in their domains. These investment briefs could also map areas with economic activity but low access to energy to attract investments.

- Improve ease of doing business for clean energy companies: The ease of doing business in states is critical to attracting clean energy investments. For example, mini-grid developers require land to site the mini-grids and the ease of registering and transferring property could be an incentive to attract developers.

- Direct public spending on electricity and provide incentives towards clean energy options: State governments can direct public spending towards clean energy options for MSMEs. This could be through the provision of tax breaks for MSMEs using clean energy in order to enable them recoup the high upfront costs of acquiring clean energy

systems. The government could also create special purpose vehicles with private companies for the development of mini-grids where the assets of the mini-grid are split between the state government and the developer, and possibly the community where the mini-grid is sited. This acts as a form of subsidy to the mini-grid, effectively lowering how much the customers will pay in tariffs.

CONCLUSION

There is great potential in using off-grid renewable energy to provide regular and affordable power to Micro, Small and Medium-Sized Enterprises (MSMEs) which will remove one of the biggest impediments to this sector which is unavailability of power. The SMSE sector is capable of adding growth to the economy, creating more and newer cottage industries and creating jobs for both skilled and unskilled workers,. This will enhance economic development by increasing incomes and also help Nigeria meets its renewable energy generation and electrification targets; and Nationally Determined Contributions under the Paris Climate Accord.

There is also a huge opportunity for the Federal Government and state governments to provide targeted financing and incentives for the Off-Grid renewable sector with a focus to driving SMSE – so as to enable the energy transition to renewable energy sources by MSMEs. We hope that governments will use this policy brief to inform their policy design for achieving this objective.

Towards democratizing energy access and addressing Nigeria's perennial power issues – the need for implementation of the various policies and incentives to empower MSMEs, trade associations, chambers of commerce and citizen groups should be the focus on the country at this stage. Furthermore, there is the need to further provide information through engagement and advocacy to MSMEs directly with respect to finding sustainable solutions to suit their peculiar business needs and challenges.

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