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Achieving a US\$1 Trillion Economy and the Maritime Paradox

BY SOJI APAMPA



*His Excellency, Bola Ahmed Tinubu
President of the Federal Republic of Nigeria*

According to UNCTAD, "Over 80% of the volume of international trade in goods is carried by sea, and the percentage is even higher for most developing countries." The greater the level of economic activity in Nigeria, the higher the throughput of goods imported and exported by sea. Nigeria has recently begun to emphasise the potential of the marine and blue economy. Great expectations abound given the new administration's target of achieving a US \$1 trillion economy by 2030 from the current level of US \$435m. This will bring Nigeria on par with a country like Indonesia (assuming their GDP remains constant) at US \$1.05 trillion.

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Indonesia, with a population of 278 million, might be a suitable comparator for Nigeria. Although Indonesia is a significant exporter of crude petroleum and natural gas like Nigeria, it is also well known for its rubber, coffee, cocoa, and palm oil. It also produces a wide range of other commodities, such as sugar, tea, tobacco, copra, and spices (e.g., cloves)[1] - agricultural produce, something Nigeria desires to get right. In chasing these potentials, Nigeria hopes to leverage not only the Blue Economy touted as worth some US\$2.5 trillion per annum[2] but a share of the combined US\$3.4 trillion GDP that the Africa Continental Free Trade Area (AfCFTA) is poised to generate.

deployment and adoption of technology, and finally, improved automation of services to reduce human contact and error.

Nigeria has been driving reforms in the maritime sector that have produced a clear set of operating rules documented in the Nigeria Port Process Manual (NPPM), the implementation of which is being driven by a Port Standing Task Team (PSTT) headed by the Nigeria Shippers' Council. Nigeria's Minister for Marine and the Blue Economy has said that full compliance will continue to be demanded as Nigeria is ready "...to enhance efficiency at the ports [compliance and rules enforcement] and facilitate the establishment of private sector-led Maritime Development Zones for the co-location of ancillary services such as "wreck removal, wreck



Credit: Africanews.com

The Container Port Traffic, TEU, of Indonesia is over 12 million, while that of Nigeria is just over 1.6 million. Indonesia's trade throughput in 20-foot container equivalents is about 7.5 times that of Nigeria. If this is what trade looks like at US\$1 trillion, it means that Nigeria must move its trade facilitation up by a factor of 10. What does this do for the possibility of maritime harms being imported or multiplied?

The Maritime Paradox is that as volumes grow through better trade facilitation by countries, the risk of being vulnerable to maritime crime also increases. Still, both are managed through improved compliance with the rules, improved

recycling, shipbuilding, ship repairs, etc."[3] According to him, "We are working to streamline the number of government agencies operating at the ports through the full implementation of the National Single Window initiative [automation]... We are also automating port operations through the deployment of a Port Community System and phasing out manual cargo inspections [technology]."[4]

The government's goal is to build a maritime and blue economy sector that makes a substantial contribution to Nigeria's GDP. How should Nigeria manage the maritime paradox?

[1] <https://www.britannica.com/place/Indonesia/Economy>

[2] <https://thefinancialexpress.com.bd/views/paving-the-way-for-blue-economy-1550070336>

[3] <https://dailynigerian.com/nigeria-marine-blue-economy/>

[4] Ibid.

In this edition of the Bulletin, the UNODC walks us through their efforts to combat transnational organized crime in the West and Central Africa regions, emphasising the maritime sector. The National Drug Law Enforcement Agency (NDLEA) addresses the harms from their perspective, as does the Nigeria Immigrations Service. The final article, by the Nigeria Shippers' Council, sets the argument for increasing trade facilitation, suggesting that with greater clarity around rules and greater compliance, more technology and more automation, economic growth can occur sustainably.

ABOUT THE CONTRIBUTOR

Mr. Soji Apampa is the Co-Founder/CEO of the Convention on Business Integrity (CBI). For over 30 years, he has led advocacy, research, designed & implemented governance anti-corruption interventions through partnerships with international donor institutions such as DfID, Maritime Anti-Corruption Network (MACN), and MacArthur Foundation.



Credit: UNODC

Combating Transnational Crimes in West & Central Africa: The Role of the Maritime Sector

CONTRIBUTED BY:



UNODC

United Nations Office on Drugs and Crime

Over the last two decades, organised crime affecting West and Central Africa has evolved structurally, becoming both more violent and more sophisticated. Transnational organised crime is a multifaceted issue involving a diverse range of continuously evolving illegal markets such as drug trafficking, kidnapping, human trafficking, cattle rustling, illegal fishing, piracy, arms smuggling, money laundering, oil theft and illegal mining among others. Addressing transnational crime is crucial given the region's significance and the multiple threats that these crimes pose to security, economic development, and governance.

The transnational organised crime threat assessment for Nigeria (NOCTA) report launched in September 2023 reveals that maritime crime, which initially affected predominantly ships under anchorage in the form of robbery of stores and crews' property, evolved to the hijacking of ships, in particular oil tankers, and stealing of their entire cargo, to the attacks on ships with the purpose of kidnapping for ransom of crew members. Maritime crime can often be a subset of transnational crime when the criminal activity in the maritime domain has implications across borders, or when the transnational organised crime uses the maritime environment as an avenue for committing the crime or transferring the object thereof.



THE MARITIME PLATFORM

Providing solutions to challenges encountered in Nigerian Ports. In collaboration with the Maritime Anti-Corruption Network (MACN).

www.youtube.com/@integrityradio



For instance, pirates operating off the Gulf of Guinea also affect the international shipping routes, thereby making it a transnational concern. The sea provides a vast, unmonitored expanse that can be exploited for smuggling drugs, arms and people. Many transnational criminal organisations use maritime routes to move their illicit goods via speed boats, semi-submersible vessels etc.

the relevant United Nations Conventions at normative and operational levels. Most Member States in the region are parties to the main international instruments on organised crime but face challenges in its meaningful implementation. UNODC therefore supports Member States in West and Central Africa in enhancing the capacities of their law enforcement entities to better prevent and



West and Central Africa's extensive coastline, combined with its proximity to major drug routes from Latin America to Europe makes it a strategic location for various forms of maritime and transnational crime. Traffickers exploit the region's maritime domain due to the limited naval and coastguard capacities. In particular, the Niger Delta in Nigeria, a significant oil producing region and host to a substantial level of maritime activities, has witnessed illicit activities related to oil theft, illegal oil bunkering and armed robbery at sea. Crude oil theft and illegal bunkering, where criminals tap into pipelines to steal crude oil, then refine it or sell it internationally, is a prime example of how maritime and trans-national crime intertwine.

UNODC promotes effective responses to transnational organised crime including all forms of maritime crimes by facilitating the implementation of

address transnational organised crime and other forms of maritime crimes, while providing technical capacity building and assistance geared towards all aspects of strengthening the rule of law, working with law enforcement authorities, prosecutors, judges and other related actors in these countries where the convergence of drugs, trafficking in firearms, crime, human trafficking, illegal fishing, piracy, arms smuggling, money laundering, and oil theft threatens stability and security.

Through its Global Maritime Crime Programme, UNODC is assisting Member States in West and Central Africa to enhance and coordinate their efforts against piracy and maritime crimes. In terms of regional coordination and cooperation support, within the Yaoundé Architecture, UNODC has

provided technical assistance to support the key institutions of the Yaoundé Maritime Security Architecture - a common regional strategy to prevent and prosecute illicit activities in the waters of the Gulf of Guinea.

At the regional level, UNODC has provided technical support to ECOWAS to develop a Supplementary Act on the Conditions of Transfer of Persons Suspected of Piracy and their Associated Property and/or Evidence, which was adopted on 3 July 2022 by the Authority of the Heads of State and Government of ECOWAS at its 61st Ordinary Session.

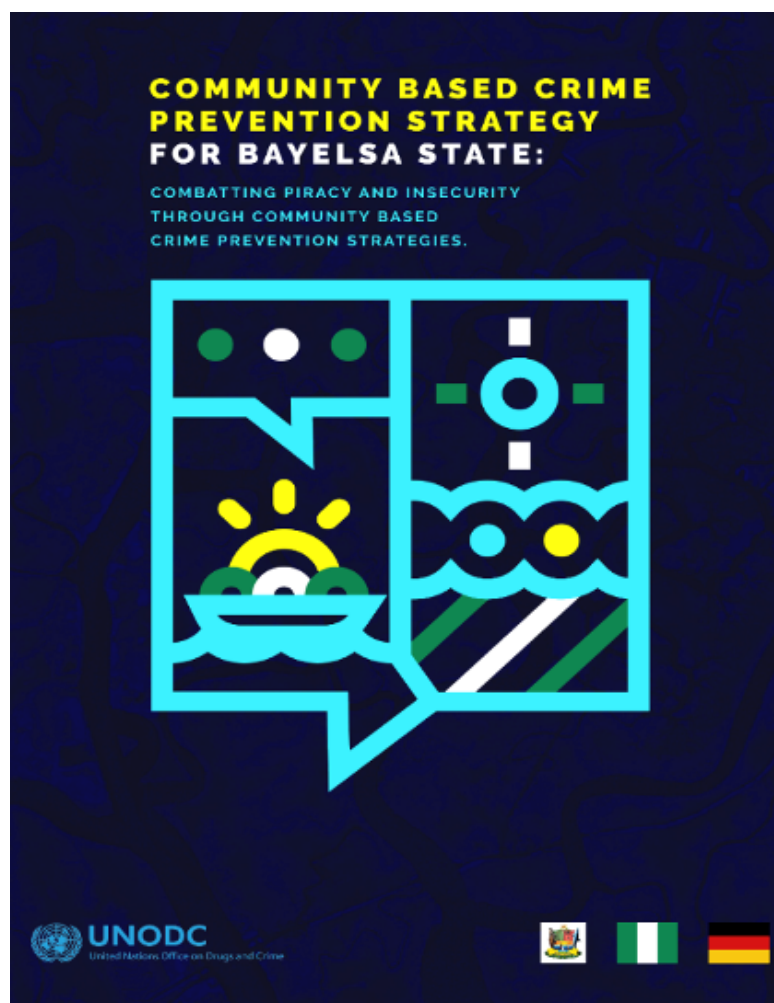
Following the adoption of the Act, UNODC has further conducted assessments for fair and efficient trials, human rights-compliant detention, and prepared implementing arrangements in the form of Standard Operating Procedures for the Act in Nigeria, Togo, Senegal, Cabo Verde and Liberia to support handover procedures, onboard detention and evidence collection. UNODC further supported sea exercises to test the implementation of these handover agreements.

In the area of capacity building support at the regional level, to bolster enforcement action at sea, UNODC has and continues to deliver a wide range of activities to help improve states' capacity to effectively deter, detect and interdict piracy. This has been achieved amongst others through the establishment of Visit, Board, Search and Seizure (VBSS) Centres of Excellence, in partnership with the Navies of Nigeria and Ghana to offer trainings on effective interdiction and evidence collection within the ECOWAS Zones E and F of the Yaoundé Architecture.

Underlining the importance of a community-based crime prevention approach to address the root causes of piracy and criminal activities in the Gulf of Guinea, UNODC has supported crime prevention initiatives starting with the Niger Delta region of Nigeria as a pilot model.

In this regard, UNODC has supported the Bayelsa State Government of Nigeria to develop a community-based crime prevention strategy to achieve a "whole-of-society" approach in tackling maritime crimes. The strategy is accompanied by action plans to improve community-centred policing and the exchange of intelligence to identify security risks. UNODC believes that there is a need to expand the development of such strategy beyond Bayelsa State to cover all States of the Niger Delta region of Nigeria, as well as the most vulnerable communities in other parts of the Gulf of Guinea region.

To this end, it suffices to conclude that the ability to combat transnational organised crime in West and Central Africa requires a holistic, multi-pronged approach that leverages the strengths of the maritime sector, regional collaborations, international partnerships and local communities.



Fighting Drug Trafficking as an Organised Crime in the Maritime Sector

CONTRIBUTED BY:
NATIONAL DRUG LAW ENFORCEMENT AGENCY (NAFDAC)



Credit: Stepfan Heunis

Nigeria has, for years, been one of the main transit routes for drug trafficking in the Gulf of Guinea by South and Central American syndicates; drugs often travel from Brazil and Latin America through West Africa to Europe and Asia. Drug trafficking is often undertaken by sea because it enables traffickers to move high substance volumes. Daily, cartels and organised crime rings use ships and boats to transport large quantities of drugs and narcotics worldwide.

In Nigeria, the National Drug Law Enforcement Agency (NDLEA) is responsible for eradicating illicit drug production, trafficking, and abuse. At Seaports, NDLEA officers conduct searches, seize drug exhibits, and arrest and prosecute drug offenders. Their tasks include boarding and rummaging vessels, stuffing and examining export cargo, examining imported cargo, and conducting Marine patrol of waterways. NDLEA works to prevent and detect violations of the NDLEA Act, collaborating with the Nigeria Customs Service (NCS) to monitor the movement of goods and persons, detecting consignments suspected of containing narcotics and psychotropic substances, surveilling harbour and dock areas, investigating arrested individuals' assets, and tracing proceeds from NDLEA Act offences.

NDLEA operates a Directorate of Seaports Operations covering major ports like Apapa, TinCan,

Lekki, Onne, Calabar, and Delta. Under the dynamic leadership of the NDLEA Chairman/Chief Executive Brig. Gen. Mohamed Buba Marwa (rtd) CON, OFR, the Directorate of Seaports Operations seized 240 tonnes of various types of drugs in the past 33 months.

Seizures include cocaine concealed in bulk sugar aboard vessels like the MV Spar Scorpio (43.110kg on January 12, 2021), M.V. Chayanee Narce (32.19kg on October 9, 2021), MV Karteria (13.65kg), and M.V Cooper Island (24kg). Other unique seizures involved the concealment of Amphetamines (Captagon Tablets) hidden in the rotor coils of two machines from Lebanon, several seizures of Cannabis Indica (loud) from Canada concealed in vehicles and motor parts, and seizure of tramadol and Codeine syrups in containers with other goods.

NDLEA Marine collaborated with Navy, Customs western Marine, and NSCDC Marine, intercepting over 110 tonnes of Cannabis Sativa (Loud) from Ghana. Successful efforts against drug trafficking in the Maritime Sector requires joint operations and collaboration among different security agencies. The agency intends to leverage its repositioning and sectoral partnerships with other maritime agencies to sustain its progress in tackling organised crime, particularly as it relates to drug trafficking.

Fighting Trafficking in Persons & Smuggling of Migrants: Role of the NIS in the Maritime Domain

CONTRIBUTED BY:
THE NIGERIAN IMMIGRATION SERVICE

OSOGBO



HUMAN TRAFFICKING

Credit: TVC News Nigeria

NIGERIA IMMIGRATION SERVICE ARRESTS ONE SUSPECT IN OSUN

The Nigeria Immigration Service (NIS) oversees the control of entry and departure of persons into and out of the country as part of its statutory duties mandated by the Immigration Act of 2015 (Amended). Yet, trafficking in persons (TIP) and smuggling of migrants (SOM), and other forms of organised crime associated with human trafficking, remain issues not confined to Nigeria but pervasive globally.

Nigeria, through law enforcement agencies such as the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), the Police Force, and the Nigeria Immigration Service (NIS) — the lead agency in Border Security and Migration Management — have been actively combating these hydra-headed problems. These issues not only bring embarrassment to the nation but also perpetrate modern-day slavery, exploiting victims and inflicting untold hardships, sometimes resulting in fatalities. Such tragedies occur during transportation across hazardous terrains such as the Sahara Desert or through perilous sea voyages via unapproved routes on unconventional vessels, leading to capsizing or drowning.

Therefore, discussing and addressing the TIP/SOM issue necessitates a focus on preventive measures

against human trafficking by the government and its agencies. Several approaches have been adopted by law enforcement agencies to control irregular migration and combat trafficking in persons. Some of these include:

1. Raising Awareness: This involves two functions:

- **Public Enlightenment:** Utilising mass media (radio, television, jingles, newspapers, social media and other printed media) to educate and raise awareness about the activities and ills of human trafficking.
- **Seminars, Training, and Workshops:** Conducting events to inform people about trafficking signs and prevent them from falling victim.

2. Advocacy: Defined as any action that speaks in favour of, recommends, argues for a cause, supports or defends, or pleads on behalf of others, advocacy involves establishing organisations and agencies to support efforts to eradicate human trafficking and provide support for survivors, including NAPTIP and NGOs such as WOTCLEF, among others.

3. Education: Establishing schools and providing widespread, low-cost, and accessible educational opportunities is critical to preventing vulnerable children – especially those from less privileged backgrounds – from exploitation as child labourers or domestic servants.

4. Legislation and Firm Consequences: Stiffer and tougher penalties and punishments (including forfeiture of assets and freezing of accounts) should be imposed on perpetrators of human trafficking so as to deter participation in such crimes. Agencies such as NAPTIP, collaborating with NIS and other relevant bodies, should intensify efforts to track and apprehend offenders.

5. Job Creation and Provision of Social Amenities: The Government must prioritise creating job opportunities for young graduates and other youths, and must develop social infrastructure/facilities to dissuade individuals, especially young people, from being lured by trafficking agents.

Implementing and enforcing these measures alongside several other action plans will significantly aid in curbing this heinous crime against humanity. While a complete eradication may prove difficult, reducing the number of victims, frustrating trafficking activities, and discouraging patronage through prosecution, public shaming, and freezing fraudulent accounts, as prescribed by the law, will effectively combat this menace.



PROMOTING “SOP” COMPLIANCE THROUGH COLLECTIVE ACTION IN PARTNERSHIP WITH GHANAIAN MARITIME AGENCIES

On July 28, 2023, the Maritime Anti-Corruption Network in collaboration with the Ghana Maritime Authority and the Convention on Business Integrity convened a high-level stakeholders meeting that brought together senior officials of maritime institutions in the public, private and civil society sectors.

The meeting titled, *“Promoting Compliance with Standard Operating Procedures (SOPs) in the Ghana Maritime Industry through Collective Action”*, reviewed the journey to strengthening compliance to SOPs and reducing corrupt practices in Nigeria’s maritime sector through the conduct of a corruption risk assessment which culminated in the development of an Integrity Plan that led to cross-agency collaboration to improve standard setting for the Nigerian maritime industry, the introduction of an effective grievance reporting/redress mechanism, accompanied by a consequence management framework, and capacity strengthening for port officials as part of a behaviour modification approach.

The purpose of the July 28 meeting was to establish a cooperation with Ghana maritime authorities to review the strengths, threats, and potentials to further improve vessel and cargo clearance processes in Ghana, with particular emphasis on promoting transparency around SOPs and service charters, and establishing a grievance reporting and redress mechanism, overseen by an independent industry ombudsman.

The meeting was attended by senior industry stakeholders from institutions including Ghana’s Ministry of Transport, and Trade and Industry; Office of the Special Prosecutor, Ghana Ports and Harbour Authority, Ghana Revenue Authority - Customs Division, Ghana Shippers’ Authority, and Ghana Immigration Service. Other agencies in attendance were Ghana Port Health, Marine Police, Ghana Anti-Corruption Coalition, Ship Owners Association of Ghana as well as the Regional Maritime University.

The resolution of stakeholders from the meeting was the agreement to designate Ghana Maritime Authority as the lead agency responsible for coordinating cross-agency review of how to cooperate with MACN and CBI to strengthen SOP compliance and industry outcomes.

Facilitating Trade while Mitigating Maritime-Related Economic Harms: The Nigerian Shippers' Council and Port Standing Task Team's Approach



Credit: Shippingposition.com.ng

Introduction

Nigeria, as a maritime nation, faces the challenge of balancing trade facilitation and mitigating maritime-related economic harms that could negatively impact its populace. This article explores the strategies employed by the Nigerian Shippers' Council (NSC) and the Port Standing Task Team (PSTT) to foster efficiency, transparency, and compliance with the Nigerian Port Process Manual (NPPM). Our focus is on the efforts of the NSC and PSTT to enhance trade facilitation while safeguarding the populace from adverse economic impacts resulting from maritime operations.

Mandate of the NSC

The NSC serves as Nigeria's port economic regulator, mandated to promote and protect the interests of shippers and ensure a conducive business environment within the maritime sector. The NSC fulfils its objectives through various roles and responsibilities, including:

Trade Facilitation Advocacy: The NSC acts as an advocate for shippers, aiming to streamline processes, reduce bottlenecks, & enhance efficiency in port operations. By engaging with government agencies, port authorities, & industry associations, the NSC seeks to create an environment that fosters trade

facilitation and minimises negative economic impacts on the population.

Policy Implementation: As a regulatory body, the NSC implements government policies and guidelines to improve trade facilitation. The Nigerian Port Process Manual (NPPM) is a key document developed by the government to standardize procedures and promote transparency in port operations. By leading the implementation of the NPPM, the NSC aims to mitigate economic harms such as delays, corruption, and unnecessary costs that could affect businesses and the populace.

Dispute Resolution: The NSC plays a crucial role in resolving disputes among maritime stakeholders. Through its Dispute Resolution Department (Complaints Unit), the NSC provides a platform for shippers and stakeholders to resolve grievances, ensuring fair treatment and minimising economic harms resulting from conflicts or disputes in port operations.

Role of the Port Standing Task Team

The Port Standing Task Team (PSTT), established by the federal government and strongly supported by the NSC, ensures compliance with the Nigerian Port Process Manual (NPPM) and fosters efficiency and transparency in port operations. Made up of senior

level representatives from key government agencies, port operators, and industry stakeholders, the main responsibilities of the PSTT include:

- **Monitoring:** The task team conducts regular monitoring of port operations to identify bottlenecks, inefficiencies, and non-compliance with the NPPM. By tracking standardised procedures' implementation, the team can identify areas for improvement, enhance trade facilitation, and mitigate economic harms resulting from non-compliance to SOPs or inefficiencies.
- **Compliance Enforcement:** The PSTT plays a vital role in enforcing compliance with the NPPM. Through inspections, audits, and assessments, the team ensures entities involved in port operations adhere to standardised procedures outlined in the manual. By enforcing compliance, the task team mitigates economic harms such as delays, unfair treatment, and unnecessary costs that could hinder trade facilitation and affect the populace
- **Capacity Building & Training:** To ensure NPPM compliance, the task team conducts capacity-building programmes for port officials, customs officers, and other stakeholders involved in port operations. These initiatives aim to enhance their understanding of the NPPM, promote best practices, and improve their knowledge and skills to prevent economic harm caused by inadequate processes or lack of compliance.
- **Stakeholder Engagement & Collaboration:** The PSTT actively engages stakeholders, including government agencies, industry associations, and port operators, to foster collaboration and ensure effective NPPM implementation. Regular consultations facilitate a unified approach among stakeholders, reducing the likelihood of economic harms resulting from conflicting or disjointed practices.

Strategies for Mitigating Maritime-Related Economic Harms



Mr. Moses Fadipe, National Coordinator, PSTT

The NSC and PSTT implements strategies and initiatives to improve trade facilitation while mitigating maritime-related economic harms. These strategies include:

- **Streamlining Processes and Reducing Delays:** Efforts are made to streamline processes, eliminate bureaucratic bottlenecks, and reduce delays in port operations. This includes advocacies for implementing efficient documentation procedures, enhancing cargo handling processes, & leveraging technology to expedite clearance and reduce turnaround times. Minimising delays aim to prevent economic harms caused by storage fees, demurrage charges, and disruptions to supply chains.
- **Transparency and Anti-Corruption Measures:** These are crucial in mitigating economic harms. The NSC promotes transparency in port charges tariff structures, and customs processes. By implementing such measures to prevent corrupt practices, such as bribery and extortion, and with the complementing effort of the PSTT, the NSC safeguards businesses and the populace from financial losses and unfair treatment.

- **Enhanced Information Sharing and Communication:** This component is vital to stemming economic harms. The NSC and task team facilitates the exchange of relevant information among cooperating agencies, ensuring that all parties involved in port operations have access to accurate and timely data. This enables better planning, coordination, and decision-making, reducing the risk of economic harms resulting from miscommunication or lack of information.
- **Capacity Building for Efficiency & Compliance:** Capacity-building programmes are conducted to enhance the skills and knowledge of personnel involved in port operations. Training initiatives focus on areas such as operational efficiency, service delivery, compliance with the NPPM, and understanding trade facilitation principles. By equipping port officials with the right expertise, port agencies are able to promote efficient and compliant practices, minimising economic harms arising from inadequate skills or knowledge gaps.
- **Stakeholder Engagement & Public Awareness:** Engaging with stakeholders and raising public awareness about trade facilitation and port

processes are essential strategies. The NSC and PSTT actively involves stakeholders in decision-making processes, soliciting their input and feedback. Moreover, public awareness campaigns educate the populace about their rights, available redress mechanisms, and the importance of fair and efficient port operations. By promoting stakeholder engagement and public awareness, government agencies foster a sense of shared responsibility and minimise economic harms caused by ignorance or exclusion.

In conclusion, the NSC and PSTT vastly contributes to promoting trade facilitation while mitigating maritime-related economic harms in Nigeria. Their efforts in streamlining processes and promoting compliance to SOPs while implementing a redress mechanism demonstrates the capacity to considerably address the maritime paradox of balancing trade facilitation with potential economic harms occasioned by trade activities in the industry

ABOUT THE CONTRIBUTOR

Mr. Moses Fadipe is a maritime regulatory expert with over 31 years experience working with the Nigerian Shippers' Council. He currently serves as the Director, South West, at the NSC and acts in the capacity of National Coordinator of the Presidential Port Standing Task Team (PSTT).



Credit: ISS Africa

MACN/CBi Hosts 4th Compliance Roundtable



On September 7, 2023, Nigeria's Federal Ministry of Transportation in partnership with the Maritime Anti-Corruption Network (MACN) and the Convention on Business Integrity (CBI Nigeria) convened the fourth Compliance Roundtable. Following the precedent set by previous Roundtables, discussion centred on ways to reduce corruption, promote accountability, ensure efficiency and quality service delivery, and improve compliance with Standard Operating Procedures (SOPs) and the Nigerian Ports Process Manual (NPPM)- this time, through the lens of data. The event explored what data is currently gathered, methods and systems to gather data, timely collection, and rapid response to SOP breaches, and how the data can be analysed to effect sustainable and trackable changes.

The Roundtable was attended by the Federal Ministry Of Transportation, the Independent Corrupt Practices and Other Related Offences Commission (ICPC), the Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), Nigerian Ports Authority (NPA), Port Standing Task Team (PSTT), Nigeria Immigration Service (NIS), the Anti-Corruption Academy of Nigeria (ACAN), National Drug Law Enforcement Agency (NDLEA), Nigeria Customs Service (NCS), Marine Police Lagos Command, Nigeria Agricultural Quarantine Service (NAQS), Federal Road Safety Corps (FRSC), National Association of Government Approved Freight Forwarders (NAGAFF), Council for

the Regulation of Freight Forwarding in Nigeria (CRFFN), Nigerian Chamber of Shipping, Federal Competition and Consumer Protection Commission (FCCPC), National Air Freight Forwarders and Consolidators (NAFFAC), Calabar and Port Harcourt Integrity Alliance, Association of Maritime Truck Owners (AMATO), the Presidential Project Steering Committee (PSC), Cloverleaf Shipping, & members of the press.

In delivering an opening remark, Mr. Soji Apampa, CEO, CBI, underscored the significance accorded to the maritime industry in Nigeria, evidenced by the establishment of the Federal Ministry of Marine and Blue Economy. Therefore, it is imperative that port authorities shift their focus from mere effectiveness to pushing for greater operational efficiency within the sector; realising this objective through stricter adherence to Standard Operating Procedures (SOPs) and compliance monitoring.

In his remarks, Mr. Vivek Menon, Director, MACN, focused on the need to drive change for operational efficiency by extending the efforts and capacity of port agencies to employ data and evidence-based approaches in their cyclical compliance framework, prioritising the **definition** of standards for processes supported by a **Prevention, Detection, Response, and Evaluation** mechanism.

Representing Honourable Emmanuel Jime, Executive Secretary/CEO, Nigerian Shippers Council, Mr. Moses Fadipe, NSC Director and National Coordinator of the Port Standing Task Team (PSTT) delivered a keynote address on the topic “Data Informed Decision Making for Sustainable Port Reform and Strengthened Compliance Arrangements.” Hon. Jime stated that “data has become the lifeblood” that drives operational efficiency and innovation. Therefore, harnessing data on port operations is necessary to enable the Federal Government to unlock valuable insights, make informed decisions, and drive sustainable port reforms. The Executive Secretary exhorted port officials to look at data as a means by which agencies can proactively identify and address challenges to compliance with the Nigerian Port Process Manual (NPPM) in line with global industry best practices.



Mr. Moses Fadipe, NSC Director South West & PSTT National Coordinator, delivering a presentation at the Compliance Roundtable

On her part, the Permanent Secretary of the Federal Ministry of Transportation, Dr. Magdalene Ajani, who was represented by Mr. Babatunde Sule, Director of Maritime Services, lauded the commendable efforts of the NSC, TUGAR, ICPC, MACN, and CBI in propelling maritime reforms by actively supporting, sustaining, and implementing strategies aimed at ensuring compliance with SOPs.



Mr. Babatunde Sule, Director of Maritime Services, FMoT, delivering a presentation at the 4th Compliance Roundtable

She underscored the importance of milestones such as strengthening the compliance arrangement within port agencies through, for example, the Compliance Function training series to further address the issue of corruption, while acknowledging that the challenges ahead are formidable and would need collaboration among various port agencies and a resolute political will to drive change. She concluded her remarks by expressing her steadfast belief that through sustained dialogue and determined implementation of strict compliance measures, a secure, data-driven maritime sector would ultimately be realised.

Following the keynote addresses, various agencies of the Federal Government gave account of their efforts to improve the compliance practices of their officers. The Federal Road Safety Corps (FRSC) informed the meeting that it is for example collaborating with ICPC to apprehend erring officers and collect data on staff conduct during their duties. The Nigerian Customs Service (NCS) acknowledged that while compliance is integrated into decision-making at the strategic level, further work is required to improve adherence to SOPs among the enforcement ranks. As part of the NCS’s approach to improving compliance, Deputy Comptroller Aliyu, who serves as the OC Enforcement (Tin-Can Port), explained that Custom's strategy

includes risk profiling and ensuring that the NCS does not facilitate the trade of non-compliant importers and exporters. He added that the NCS has a rewards-based system that recognises exemplary performance and imposes sanctions on officers found in breach of SOPs; and explained that this system operates in addition to a dispute resolution mechanism at the command-level that is designed to cultivate a "service" culture within the ranks. D.C. Aliyu emphasised Custom's willingness to cooperate with other agencies while stakeholders that the next Compliance Roundtable should include a presentation from Customs on the key performance indicators such as cargo inspection volume per day and container routing through different channels.

He explained that the Nigerian Port Process Manual (NPPM) serves as the comprehensive guide for port operations, standardising processes, delineating port agency roles, and promoting transparency. Therefore leveraging data, the PSTT now has the capacity to better identify deviations from prescribed procedures and take appropriate action. This progress, he added, provides the basis for successful implementation and evaluation of the manual. Furthermore, he stated that data helps to assess the effectiveness of the NPPM, identify areas requiring enhancement, and facilitate evidence-based decision-making.

On the other hand, Mr. Fadipe continued, data has enabled the PSTT to track performance through



Representative of the Federal Road Safety Corps (FRSC)

Representative of the Nigerian Customs Service (NCS)

Representative of the Nigeria Agricultural Quarantine Service

Representative of the Marine Police, Nigeria

In its presentation, the Nigeria Agricultural Quarantine Service (NAQS), represented by Dr. Kekere, explained that its approach to improving compliance levels have included investments in training farmers to adhere to NAQS standards and the establishment of the E-Phyto System, which has helped the agency to legitimise its licensing and documentation process, reducing the risk of fake documentation that served as a barrier to Nigerian exporters participating in international trade due to resulting bans on Nigeria-made goods abroad.

Mr. Fadipe, who presented on behalf of the PSTT, echoed that data represents a potent instrument for monitoring operations, detecting non-compliance and enforcing regulations, all of which empowers port authorities to identify irregularities and potentially corrupt practices.

metrics such as turnaround time, vessel waiting time, and cargo clearance duration, helping authorities to identify inefficiencies and implement targeted interventions. Additionally, Mr. Fadipe observed that data serves as critical evidence in legal actions against entities or officials involved in corrupt practices, strengthening case resolution, and deterring future corruption.

He concluded his remarks by stating that data sharing among stakeholders promotes transparency and facilitates a comprehensive understanding of sector challenges as well as opportunities; and by exchanging data and best practices, stakeholders can learn from one another, identify innovative solutions, and develop standardised approaches to compliance and enforcement.

Nigerian Ports Authority - Single Window crucial to Data Gathering & Compliance in Port Sector

Represented by Mrs. Victoria Tarfa, the Nigerian Ports Authority (NPA), in its presentation at the Compliance Roundtable, addressed the ongoing efforts to enhance the joint boarding process, with a particular focus on data gathering and generation to ensure compliance. This data encompasses various key metrics, such as the number of participating agencies during joint boarding, the registration status of boarding personnel, the quantity and timing of official disembarkations, and the response time of pilots during anchorage to guide a vessel to berth. Mrs. Tarfa strongly advocated for the adoption of the recommended single window practice, emphasising that it leaves no room for non-compliance. With the single window, she added, there would be a robust monitoring mechanism in place to ensure efficiency and strict adherence to Standard Operating Procedures and timelines. In essence, she concluded, compliance will be an imperative under this system.



Mrs. Cynthia Akpomudiare, CBI's Director of Stakeholder Relations leading a session at the Roundtable

The Roundtable concluded with a discussion about the process of translating daily operational activities into data. Mr. Apampa extended an offer to assist any interested port agency in this endeavour, offering to provide guidance in identifying key performance indicators, offering templates for data collection, and providing additional support as needed. After a brief question-and-answer exercise, closing remarks were offered by Mr. Emmanuel Bosah, CBI's Programme Director.



Representative of the Nigerian Ports Authority



Representative of the Integrity Alliance, Cross River State



Director General Nigerian Chamber of Shipping

Agency Spotlight: The Anti-Corruption Academy of Nigeria - The ICPC Academy

Data-Gathering, Analysis, Key to improving Compliance, Transparency, and Accountability at Nigeria's Ports

During the 4th compliance Roundtable, the Provost of the Anti-Corruption Academy of Nigeria (ACAN) - The ICPC Academy, Professor Olatunde Babawale, represented by the Director of Training, Mr. Richard Bello, delivered a keynote address in which it was emphasised that confronting the challenge of SOP compliance, transparency, & accountability would require a data-driven approach which emphasises data gathering, analysis, and response.

He explained that data serves as the bedrock upon which organisations create baselines, benchmarks, and objectives to propel continuous improvement. It empowers stakeholders to monitor and assess the vitality of various processes and essential systems, spanning vessel arrivals and departures,

cargo handling procedures, documentation protocols, and adherence to regulatory mandates. Thus, by systematically collecting and scrutinising data pertaining to port operations, areas riddled with procedural deviations, accountability deficits or opacity become discernible. This information subsequently informs corrective measures aimed at refining port operations.

At the heart of this approach, the Professor stated, lies the fundamental importance of well-crafted SOPs that offer unambiguous guidance, minimises discrepancies, and promotes operational consistency. The evidence-based system, he added, would comprise of three integral components - data gathering which encompasses the collection of data throughout the port operations cycle; data analysis, entailing the utilisation of various statistical methods to scrutinise collected data and identify areas in need of corrective actions; and a response mechanism that involves implementing remedies derived from data analysis.

Prof. Babawale further explained that an effective system for data collection and analysis, as outlined, is pivotal for robust performance monitoring. Designing a system that ensures the collection of precise and reliable data necessitates the identification and definition of port sector activities to monitor, indicator selection, the identification of sustainable data sources, and the creation of a data collection and analysis framework, culminating in the population of a comprehensive database.

He concluded his remarks by observing that a fully functional data-driven system yields a stable foundation for data collection and operational data processing and that over time, a populated database, equipped with sector-specific indicators for each port activity, can offer readily accessible information and metrics to monitor sectoral performance, trends, and compliance.



Mr. Richard Bello, Director of Training, ACAN, delivering a presentation at the 4th Compliance Roundtable

2nd Port User Conference: Integrity in the International Trade Eco-System



On August 31st, 2023, the Maritime Anti-Corruption Network (MACN) and the Convention on Business Integrity (CBI) hosted the 2nd Port Users Conference titled *"Integrity in the International Trade Eco-System: A Value Chain Stakeholder Approach"* in the city of Port Harcourt, Rivers State. Unlike Regulatory Roundtables, the Conference placed equal emphasis on the voices of multiple port stakeholders – government agencies, private sector, civil society, and other port users. Further, the event expanded the conversation beyond vessel clearance to include challenges and opportunities associated with cargo clearance.

The Conference was held to review and strengthen the responses to regulatory and corruption-related risks/challenges at Nigeria's ports, providing a critical opportunity for importers, exporters, licensed agents, and other users to discuss the compliance gaps and disparities experienced in Eastern and Western Ports. Given that current reforms, including the establishment and functioning of the Port Standing Task Team (PSTT) have improved port operations in Lagos ports, stakeholders used the Conference to call on port agencies to extend similar comprehensive support to all ports, especially those in the East. This support, it was argued, is crucial to national efforts to grow the maritime industry in Nigeria, spur economic growth, while combatting corruption in a way that is inclusive and captures all voices in the initiative for port reform.

The event thus explored approaches for accelerating compliance monitoring, reporting, and enforcement to improve port processes and the business environment in Eastern ports.

In discussions, stakeholders such as Mr. Ofon Udofia, President, Rivers and Bayelsa Shippers' Association, Executive Secretary, Institute of Export Operations and Management (IEOM), and Integrity Alliance member, stated that trust is integral to all engagements in the maritime sector. He advised integrity alliance members to take advantage of the Collective Action between the government and private sector to understand vital port regulations and processes to ensure to that they do the right thing consistently and minimise regulatory risks.

Stakeholders at the event equally acknowledged that the cost of inefficiency and non-compliance has been so harmful to the Nigerian economy and consumers, particularly as the cost of living crisis squeezes household incomes and budget. Mr. Vivek Menon, Associate Director, MACN, in his address, stated that corruption is "[the] premium [that the] private sector pays to an inefficient system to find their own efficiency." In effect, this means that where port users are constrained by an inefficient system or even infrastructure gaps, they look for alternative means of resolving their risk/challenge, including making corrupt payments to facilitate a port process.

Mr. Menon explained that MACN's success in Nigeria has largely come from understanding the unique challenges faced by each stakeholder in the industry, and avoiding the very tempting "blame game" that often clouds the solutions' process in the industry. He therefore called for greater collaboration between the port agencies and private sector to track challenges and jointly consider port policy and compliance/anti-corruption enforcement actions that are necessary to protect and promote efficiency in the maritime sector.

Echoing the contributions of other stakeholders, Mr. Etim, President, Calabar Chamber of Commerce and Industry, and President, Integrity Alliance Cross River State, concurred in his remarks that since data shows that inefficiency and corruption accounts for an additional 40-70% of the costs on imported goods, food security in Nigeria will depend on a functional shipping system, where delays and inefficiencies in transporting goods are not permitted to hinder business competitiveness.



The Commissioner of Police, Rivers State, participating at the 2nd Port User Conference

The Nigerian Maritime Law Association (NMLA), rep. by Dr. Damilola Osinuga, highlighted that Nigeria's lack of transparency and accountability has made



Mr. Moses Fadipe, restating the commitment of the PSTT to expanding its compliance enforcement actions.

many vessels bypass the country for more business-friendly states such as Togo, impacting revenue and shrinking the economy. He added that fears of high financial costs at Nigeria's ports are so compelling that goods are often re-routed through land; a much longer process that likely also impacts the quality of products transported on uneven road surfaces and with poor access to storage facilities.

Some port users raised concerns about the industry's stagnation due to the reluctance of the government to invest and improve port infrastructure, or use the funds available under the Cabotage Act (passed in 2003 to increase indigenous ownership of vessels) to increase local participation in the maritime value-chain.

On their part, the PSTT restated their commitment to strengthening their team and enforcement actions in the East, including inaugurating the extended PSTT in Calabar Port to support reforms and an improved focus on compliance. The event concluded with stakeholders agreeing to work together through their various associations and groupings to engage better with port authorities. Stakeholders equally urged the government to tackle challenges such as concession seeking and infrastructural deficits to improve systems and structures for promoting greater port efficiency.

Get involved! Join the Integrity Alliance

To sustain efforts and continue the ambition to drive positive change under this initiative, there is need to form strategic partnerships with the public and private sectors. On the private sector side, the Integrity Alliance Group is a key stakeholder group that can help to achieve the following:

- Monitor ongoing reforms at the Nigerian Ports specifically, and the Maritime Industry generally, in a bid to propose changes that would aid Ports efficiency.
- Assist to popularize/publicize the Standard Operating Procedures (SOPs) and The Grievance Mechanism Portal - User Experience Diary - and other reporting helplines that enable importers, exporters and other port users to resolve issues and challenges faced.



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The graphic features the Integrity Radio logo at the top left, which includes a flame icon above the word 'integrity' and a heartbeat line below it. To the right, it says 'follow us on soundcloud: @Integrity-radio'. The main title 'All Things Maritime' is in large white font. Below it, 'INTEGRITY RADIO DISCUSSES:' is written in smaller white font. A large, stylized microphone is on the right side. A white box with a black border contains the text 'Maritime Industry Experts'. Below that, a smaller white box says 'We've also Migrated to Soundcloud'. At the bottom left, there is a dark red button with 'LISTEN NOW' in white, next to the SoundCloud logo. Below the button is the URL 'soundcloud.com/integrity-radio'.

Contact Us

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To Learn More About the Port Service Support Portal (PSSP)

The Port Service Support Portal is a complaints management and Port service support solution aimed at addressing business to business transaction problems in Nigerian Ports.

Please visit - www.pssp.ng