

# THE INTERNATIONAL JOURNAL OF BUSINESS & MANAGEMENT

## Critical Analysis of the Legal and Infrastructural Frameworks for E-commerce and Consumer Protection in Nigeria

### Muhammad Nuruddeen

Ph.D. Student, Ghazali Shafie Graduate School of Government (GSGSG)  
College of Law, Government and International Studies (COLGIS)  
Universiti Utara Malaysia, Kedah, Malaysia

### Dr. Yuhanif Binti Yusof

Senior Lecturer, Ghazali Shafie Graduate School of Government (GSGSG)  
College of Law, Government and International Studies (COLGIS)  
Universiti Utara Malaysia, Kedah, Malaysia

### Dr. Nor Anita binti Abdullah

Senior Lecturer, Ghazali Shafie Graduate School of Government (GSGSG)  
College of Law, Government and International Studies (COLGIS)  
Universiti Utara Malaysia, Kedah, Malaysia

### Abstract:

*Electronic commerce (e-commerce) is the buying and selling of goods and services via the internet. Those who engage in this kind of transaction are called "electronic consumers" (e-consumers). The success of e-commerce in any given country depends on the existence of the relevant legal framework as well as certain infrastructural facilities such as electricity, delivery system, effective internet services, among other things. Therefore, the objective of this paper is to critically analyse the legal cum infrastructural frameworks for e-commerce and consumer protection in Nigeria. The paper adopts a doctrinal research methodology approach in achieving its objective. The paper observes that Nigeria is yet to put in place the relevant legal framework for the protection of e-consumers in the country. The exiting legal framework is old and quite inadequate to cater for the needs of the e-consumers. The state of infrastructural facilities that will ensure smooth operation of e-commerce in the country is also not encouraging at all. Electricity supply is epileptic and unreliable. The delivery system of goods and services is not effective. Access to the internet is problematic, and cost of accessing same is on the high side. Hence, the paper recommends a robust overhaul of the current legal and infrastructural frameworks for e-commerce in the country. In particular, the paper recommends the amendment of the Consumer Protection Council Act 1992 and immediate passage into law of the Electronic Transactions Bill 2016. The paper also suggests that the government should provide the identified infrastructure that boosts the e-consumers' confidence and trust in the e-commerce transactions in the country.*

**Keywords:** E-commerce, consumer, protection, legal, infrastructure, Nigeria

### 1. Introduction

E-commerce is an economic sector where developed countries are now gaining a competitive advantage over developing countries like Nigeria. Any state that refuses to join the current global trend in e-commerce activities could not be a significant player in the global economy (Akintola, *et al.* 2011). Alhusban has identified three factors that determine the success of e-commerce in any given country (Alhusban, 2014). Firstly, the government must provide the relevant legal framework to ensure that the rights of e-consumers are protected (Alhusban, 2014). This is true because, according to the Organisation for Economic Co-operation and Development (OECD), consumer statutes, government policies and practices minimise fraudulent, deceptive and unfair commercial conducts (OECD, 1999). Such protections are necessary because they boost the confidence of consumers and create a more balanced relationship among actors of commercial transactions (Alhusban, 2014; OECD, 1999). Secondly, there must be in existence, the human infrastructure such as expertise in ICT, computer literacy and public enlightenment about the operations of the Internet as well as its advantages in conducting online commercial transactions. Lastly, the government must provide the needed physical infrastructure for the smooth running of e-commerce transactions. This includes good roads, efficient postal services and stable electricity.

The objective of this paper is to critically analyse the legal and infrastructural frameworks for e-commerce and consumer protection in Nigeria. To achieve this objective, the paper, therefore, is divided into four different parts. The first part is the introduction while the second examines the legal issues in e-commerce and consumer protection in Nigeria. The third part examines the infrastructural issues concerning e-commerce in Nigeria. However, in the course of analysis, reference may also be made to other jurisdictions where necessary. The last part of the paper contains conclusion and recommendations.

## 2. Legal Issues in E-commerce and Consumer Protection in Nigeria

It is evident that technological advancement throws up serious legislative challenges to all countries in the world. This is true because the existing legal norms are becoming outdated (Basil, 2004). Thus, realising the challenges and the positive impact of e-commerce on the global economy, the UN as far back as 1996 adopted the *United Nations' Commission on International Trade Law (UNCITRAL) Model Law on E-commerce* (the Model Law) (Akomoledede, 2008). The UN adopted the Model Law to serve as a pioneer e-commerce legislation for countries to copy and enact in their respective domains. The primary aim of the Model Law is to remove obstacles coming in the way of electronic documents regarding enforceability before courts of law (Akomoledede, 2008). It also aims at ensuring practices of member states in the area of e-commerce, as an emerging trend in commercial transactions, is uniform and of an acceptable standard (Akomoledede, 2008). Accordingly, the UN enjoined its Member States to enact laws and establish institutions that conform substantially to the provisions of the Model Law (Akomoledede, 2008). Equally, the United Nations Conference on Trade and Development (UNCTAD) has made a similar call but with specific emphasis on consumer protection (UNCTAD, 2015). This is to the effect that countries are encouraged to consider preparing or revising their consumer protection laws in line with the international standards. Thus, countries should consider aligning their legislation to be in tandem with the UN and OECD Guidelines. That is the *UN Guidelines on Consumer Protection 1985* and the *OECD Guidelines for Consumer Protection in the Context of E-commerce 1999*. It is believed that this will encourage harmonisation of consumer protection laws and foster consumer confidence in e-commerce (UNCTAD, 2015). Many countries have complied with these calls. For example, as of 24<sup>th</sup> April, 2017, legislation based on or influenced by the Model Law has been adopted in 68 out of 144 jurisdictions in the world (UNCITRAL, 2017). Hitherto, the Nigerian government is yet to adopt the provisions of the Model Law in the country (UNCITRAL, 2017).

### 2.1. Electronic Transactions Bill 2016

Several attempts have been made from 1999 to date, to adopt the Model Law in Nigeria. This is done by way of introducing at different occasions, *Electronic Transactions Bill* (ETB) before the National Assembly for passage into law (Basil, 2004). Unfortunately, in each occasion, such Bill could not see the light of the day (Basil, 2004; Oluchi, 2015). In 2015, the *Electronic Transactions Bill 2015* (ETB 2015) was passed by the National Assembly but the immediate past President could not assent the Bill before he vacated office on the 29<sup>th</sup> of May, 2015. In the circumstance, the Bill died with the immediate past (7<sup>th</sup>) Assembly whose tenure expired on the 29<sup>th</sup> May, 2015. However, the current 8<sup>th</sup> Assembly has re-packed the ETB 2015 but as "*Electronic Transactions Bill 2016*." It is important to note that the current ETB 2016 is a replica of the ETB 2015 both in contents and substance. Equally, it is imperative to note that the ETB 2016 has now reached an advanced stage before the National Assembly. In fact, it has been duly passed on the 7<sup>th</sup> June, 2016 by the House of Representatives, now waiting for the concurrence of the Senate. After that, it will be transmitted to the President for his assent.

Even though the ETB 2016 is yet to see the light of the day, it is, however, important at this point to briefly examine some of its provisions. The ETB 2016 aims at facilitating e-commerce transactions in Nigeria. Just like the Model Law, the ETB 2016 intends to eliminate the legal barriers to the effective use of electronic communications for commercial transactions (Oluchi, 2015). Equally, the ETB 2016 aims at providing the needed security for e-commerce transactions in Nigeria. For example, Section 21 of the ETB 2016 expressly provides that persons using electronic communications to sell goods and services to consumers shall provide accurate, clear and accessible information about themselves. This includes sufficient information about the identity, address and telephone number of the person operating the online business. This is imperative given the fact that online transaction does not need the physical appearance of contracting parties. If these kinds of obligations are not placed on the electronic trader (e-trader), the consumer may not be able to enforce his right where there is a breach from the part of the e-trader. Similarly, identifying the real owner of an online store becomes very easy with such information conspicuously on the website. This may also minimise the danger of e-consumers from falling into the trap of false e-traders and other fraudsters who use the Internet to perpetrate illegal activities.

Similarly, Section 21(2) of the ETB 2016 further provides that a person using electronic communications to sell goods or services to consumers shall provide accurate and accessible information describing the goods or services offered, sufficient to enable consumers to make an informed decision about the proposed transaction and to maintain an adequate record of the information (Oluchi, 2015).

On the other hand, Section 20 of the ETB 2016 recognises electronic agent (e-agent). Here, the e-trader is bound by whatever transaction is entered between the e-agent and the e-consumer. Section 102 of the United States of American *Uniform Computer Information Transactions Act* (UCITA) 1999 defines an e-agent as a computer program, or electronic or other automated means used independently to initiate an action or respond to electronic messages or performances without a review or action by an individual at the time of the action, response or performance.

The UCITA then goes on to provide rules for attributing the actions to an e-agent. Thus, Section 107 of UCITA provides that a person that uses an e-agent for making an authentication, performance, or agreement, including manifestation of assent, is bound by the operations of the e-agent, even if no individual was aware of or reviewed the e-agent's operations or the results of the operations (Bamodu, 2004). Hence, an e-trader can be estopped from denying any liability from any transaction concluded by the e-agent on his website.

It is hoped that the Nigerian government will soon enact ETB 2016 into law. Passing the ETB 2016 into law will go a long way in protecting the rights of online purchasers of goods and services. It may also boost the confidence of the Nigerians who wish to engage in e-commerce transactions.

### 2.2. Consumer Protection Council Act 1992

The Consumer Protection Council (the Council) is an institution established by the *Consumer Protection Council Act of 1992* (CPC Act). The Council is saddled with the responsibility of entertaining complaints from aggrieved consumers in Nigeria. In fact, the establishment of the Council is said to be the most significant action targeted at protecting consumer rights (Bello *et al.*, 2012) in the country (Ekanem, 2011). The council provides simple, speedy and inexpensive redress to the consumer's grievances (Ikoni, 2013). Therefore, the Council has the power to receive a complaint from consumers bordering on unfair trade practices, delivery of defective goods, deficiency of service and excess price charged by the trader, etc.

Although the CPC Act makes these elaborate provisions to protect consumers but looking at the entire provisions of the CPC Act would reveal that online purchasers of goods and services have no place under the CPC Act. In the first place, the CPC Act does not recognise online transactions. More so, careful study of Sections 2 and 3 of the CPC Act will testify that the CPC Act does not apply to e-commerce transactions (Enadeghe, 2013). This is obvious because in 1992 when the Act was enacted, e-commerce as it is today, was not in existence nor envisaged. Unfortunately, hitherto, the Nigerian government is yet to reform or amended the provisions of the CPC Act to cover e-commerce transactions. In the circumstance, consumers of online transactions are bound to face challenges in trying to enforce their rights. Especially before the Nigerian courts. Hence, the need for a quick legislative intervention in this regards. In Malaysia for example, before the year 2007, the *Consumer Protection Act (CPA) 1999* does not apply to electronic transactions. Section 2(g) of the Act specifically excludes such transactions (Hassan, 2012). Fortunately, the exclusion has been changed through the amendment of the CPA made in the year 2007, to include "any trade transactions conducted through electronic means." The CPA was also amended in 2010 (Amin & Mohd, 2013). Part IIIA of 2010 (amended) CPA makes provision for the protection of e-consumers against misleading and deceptive conducts. It also makes clear provision against false representations and unfair trade practices (Amin & Mohd, 2013). Thereby protecting consumers against unfair terms in standard form contracts, which are commonly used by traders and formed the basis of most contracts in the consumer transactions especially online sale of goods. Hence, with this development, an e-trader is now under obligation to provide the consumers with sufficient and correct information about the product he advertises. This is because knowledge and awareness are key to the customers' decision to buy or not to buy a particular product (Amin & Mohd, 2013). In fact, this kind of legislative reform is even needed most in Nigeria where cybercrimes and violation of consumer rights are prevalent.

### 3. Infrastructural Facilities for E-commerce Transactions in Nigeria

In addition to the legal infrastructure needed for e-commerce and consumer protection in Nigeria, the success of e-commerce further requires human and physical infrastructure. They include reliable and stable power supply, telecommunication services and specialised expertise in law and ICT (Ahmadu, 2010). Other infrastructure required for the smooth operation of e-commerce in Nigeria include computer literacy and affordable Internet accessibility, etc. In fact, Aghaunor and Fotoh have emphasised that the existence of adequate IT infrastructure is a necessary condition for the take-off and development of e-commerce in any given country (Aghaunor & Fotoh, 2006). The question now is, has Nigeria provided the needed infrastructure for e-commerce consumers in the country or? Is this yet another area of challenge in the country worthy of study? Let us now begin with the issue of electricity supply.

#### 3.1. Electricity Supply

Electricity plays a vital role in the socio-economic and technological development of every nation. Sambo and Garba stated this in their attempt to establish a correlation between socio-economic developments and the availability of electricity (Sambo & Garba, 2012). Sambo and Garba further argued that electricity availability is a major factor that speeds up development in most economies of the world (Sambo & Garba, 2012). Electricity is considered as the backbone of e-commerce. Thus, determines its success in any given country. According to Akintola *et al.*, if e-commerce is to be successful in Nigeria, the government must ensure stable electricity supply as no industry can survive without steady electricity (Akintola *et al.*, 2011). The need for stable electricity supply to e-commerce consumers cannot be over-emphasised. For example, the e-consumers need stable and reliable electricity to place orders, cancel or confirm orders, return defective goods and regular check of e-mails, etc. We can assert that unless the electricity is stable, the consumers cannot access electronic gadgets such as hand phones, laptops or iPads, etc., to enable them carry out e-commerce activities successfully.

Unfortunately, electricity supply is epileptic and inefficient in Nigeria. In fact, Adamu lamented on this situation who said that the Nigerian nation is groaning under darkness, as electricity supply is insufficient to meet consumers' demand (Adamu, 2014). Adamu further said that this had been a serious, intractable problem in Nigeria for long (Adamu, 2014). During inaugural speech, the newly sworn in Nigerian President, Muhammadu Buhari lamented on the power crisis in the country. These are his words:

- No single cause can be identified to explain Nigerian's poor economic performance over the years than the power situation. It is a national shame that an economy of 180 million generates only 4,000MW, and distributes even less. Continuous tinkering with the structures of the power supply and distribution and close on \$20b expanded since 1999 have only brought darkness, frustration, misery, and resignation among Nigerians. We will not allow this to go on. Careful studies are under way during

this transition to identify the quickest, safest and most cost-effective way to bring light and relief to Nigerians. (Buhari, 2015).

Every new government in Nigeria comes up with promises such as the above, but yet Nigerians continue to groan under darkness, as electricity supply is insufficient to meet their demands (Adamu, 2014). The situation is not healthy to the stakeholders of e-commerce transactions in the country.

### 3.2. Computer Literacy

In addition to the poor electricity supply in Nigeria, there is also prevailing computer illiteracy among the majority of Nigerian populace. Ahmadu strongly argued that there is a lack of computer literacy and understanding of the operations of the Internet among Nigerians (Ahmadu, 2010). This was corroborated by Akintola *et al.* who also said that majority of the Nigerians are not Internet/computer literate (Akintola *et al.*, 2011). Tiwalade, *et al.*, contended that Nigeria was counted among ten countries in the world with 775 million illiterate adults (Tiwalade, *et al.*, 2014). Arenyeka reported that computer illiteracy in Nigeria is common even in the academia (Arenyeka, 2013). Arenyeka reported a case of some Nigerian professors who were asked to send e-mails as part of their assessment for the position of a Vice Chancellor in one of the Nigerian Universities. Unfortunately, none of them could do so. Because they do not know how the Internet operates (Arenyeka, 2013). Thus, the significance of mass computer education and training in Nigeria cannot be over-emphasised.

### 3.3. Network Connectivity and the Cost of Accessing the Internet

Another area of challenge for e-commerce consumers the world over, especially in Nigeria is stable and affordable Internet accessibility. According to Abubakar and Adebayo, even the few Nigerians who are computer literate still face the challenges of inefficient and epileptic telecommunication services (Abubakar & Adebayo, 2014). Moreover, the cost of using the Internet in Nigeria is on the high side (Enadeghe, 2013). Enadeghe observed that these challenges discourage consumers from conducting online transactions. And indeed limit Internet accessibility to the Nigerian consumers who need to be regularly informed about the emerging risks involved in e-commerce (Enadeghe, 2013). Indeed, the absence of information may jeopardise the interest of the e-consumers as they could easily fall victims of Internet criminal activities such as hacking and frauds (Enadeghe, 2013). For example, according to Ozuru *et al.*, cyber criminals in Nigeria take advantage of the absence of sophisticated infrastructure to defraud consumers billions of Naira (Ozuru, *et al.*, 2012).

### 3.4. Delivery System of Goods and Services

Besides the lack of stable Internet connectivity and affordable accessibility, Akintola *et al.* have also identified the fact that there is a weak delivery system for goods and services in Nigeria (Akintola *et al.*, 2011). This comprises of the poor postal system and also Oluchi added the transportation system (Oluchi, 2015). In other words, Akintola *et al.* argued that there is no good road network to facilitate easy delivery of products and services and the postal system in the country is weak and insecure (Akintola *et al.*, 2011). In the end, Akintola *et al.* recommended a strategic overhaul of the delivery system in Nigeria to ensure a successful e-commerce growth and development in the country (Akintola *et al.*, 2011). Given the fact that prompt and efficient delivery of goods and services within and outside Nigeria play pivotal in the e-commerce transactions.

## 4. Conclusion

From the preceding, therefore, it is evident that e-commerce contributes immensely to the global economy. It boosts the economy of any country that wishes to take the advantages brought by the breakthrough in the modern day information technology. However, this may not be achieved without putting in place the relevant legal framework and addressing the infrastructural challenges mentioned above. It is established that the legislative arm of the Nigerian government has made several attempts to adopt the Model Law on E-commerce in Nigeria but without success. This is done by way of introducing various forms of ETBs at the floor of the National Assembly for passage into law. Unfortunately, none of such ETBs was able to see the light of the day. The hope now rests on the ETB 2016 which has reached an advanced stage at the National Assembly. The ETB 2016 aims at facilitating e-commerce transactions and guaranteeing the protection of those who partake in such transactions. In the same token, it was established that the Nigerian CPC Act does not make explicit provisions for the protection of e-consumers in the country. The CPC Act has been in existence for almost three decades now without any Amendment. This is despite ICT challenges and apparent unfair trade practices emanating from the part of the giant e-traders.

It is, therefore, the recommendation of this paper that the Nigerian government should as a matter of urgency, pass a law that would address e-commerce related issues in the country. In specific terms, the paper recommends that ETB 2016 should be passed into law without much delay. The paper equally recommends the amendment of the CPC Act. So that e-commerce would also be captured by the CPC Act. The proposed amendment to the CPC Act should explicitly capture the rights of e-consumers as well as obligations of the e-traders. Finally, the paper recommends that the Nigerian government should provide effective infrastructural frameworks that will aid the smooth operation, growth and development of e-commerce in Nigeria. Not forgetting the fact that effective legal and infrastructural frameworks for e-commerce and consumer protection will promote trust and confidence of e-consumers and investors in the country.

## 5. References

- i. Abubakar, A. S., & Adebayo, F. O. (2014). Analysis of electronic transactions bill in Nigeria: issues and prospects. *Mediterranean Journal of Social Sciences*, 5(2), 215–220. <http://doi.org/10.5901/mjss.2014.v5n2p215>.
- ii. Adamu, K. (2014). Critical Analysis of the Legal Reform Policies in the Nigerian Electricity Industry. *The University of Maiduguri Law Journal* 13 (2014): 20-41.
- iii. Aghaunor, L., & Fotoh, X. (2006). Factors Affecting E-commerce Adoption in Nigerian Banks. *Journal of Internet Banking and Commerce*. Retrieved from <http://www.diva-portal.se/smash/get/diva2:4190/FULLTEXT01.pdf>.
- iv. Ahmadu, M. L. (2010). Information and Communications Technology in Nigeria: Some Lessons on the Law and Practice of Electronic Commerce. Sokoto. (pp. 1-49). Central Coordinating Committee for University Inaugural Lectures and Seminars, Usmanu Dan Fodio University, Sokoto, Nigeria.
- v. Akintola, K. G., Akinyede, R. O., & Agbonifo, C. O. (2011). Appraising Nigeria Readiness for E-Commerce towards Achieving Vision 20:20. *International Journal of Research and Reviews in Applied Sciences*, 9(November), 330–340.
- vi. Akomolede, T. (2008). Contemporary Legal Issues in Electronic Commerce in Nigeria. *Potchefstroom Electronic Law Journal*, 3.
- vii. Alhusban, A. (2014). The Importance of Consumer Protection for the Development of Electronic Commerce : The Need for Reform in Jordan. The University of Portsmouth.
- viii. Amin, N., & Mohd, R. (2013). Online shopping in Malaysia : Legal Protection for E-consumers. *European Journal of Business and Management*, 5(24), 79–87.
- ix. Arenyeka, L. (2013, March 22). My Oga at the Top: New Media Lessons for the Older Generation - Vanguard News. Vanguard News. Retrieved from <http://www.vanguardngr.com/2013/03/my-oga-at-the-top-new-media-lessons-for-the-older-generation/>
- x. Bali, O. (2004). The Emerging Trend in E-commerce: The Nigerian Legal Perspective. In K. N. Nwosu (Ed.), *Legal Practice Skills and Ethics in Nigeria* (pp. 119–131). DCONconsulting, Lagos, Nigeria.
- xi. Bamodu, G. (2004). Information Communication Technology and E-Commerce: Challenges and Opportunities for the Nigerian Legal System and Judiciary. *Journal of Information, Law and Technology*, 2, 1-24.
- xii. Basil, U. (2004). The Growth and Challenges of Information Technology in Law Practice in Nigeria. In K. N. Nwosu (Ed.), *Legal Practice Skills and Ethics in Nigeria* (pp. 229–261.). Lagos, Nigeria: DCONconsulting.
- xiii. Bello, K. B., Bisi Aduke Suleiman, J., & Danjuma, I. (2012). Perspectives on Consumerism and Consumer Protection Act in Nigeria. *European Journal of Business and Management*, 4(10), 72–79.
- xiv. Buhari, M. (2015). “I belong to everybody, and I belong to nobody”. The President Federal Republic of Nigeria, inaugural speech, May 29, 2015. Retrieved September 18, 2015, from <http://www.vanguardngr.com/2015/05/i-belong-to-everybody-and-i-belong-to-nobody/>.
- xv. Ekanem, E. E. (2011). Institutional Framework for Consumers Protection in Nigeria. *International Journal of Advanced Legal Studies and Governance*, 2(1), 33–48.
- xvi. Enadeghe, D. (2013). Comparative Analysis of the Applicable Legal Protection for Purchasers on the Internet, in Europe & USA- Lessons for Nigeria. Central European University Budapest.
- xvii. Hassan, K. H. (2012). E-commerce and Consumer Protection in Malaysia : Advertisement and False Description. In 2012 International Conference on Economics and Finance Research (Vol. 32, pp. 45–48).
- xviii. Ikoni, U. D. (2013). A Middle Course between Consumer Protection and Environmental Protection. In A. Adekunle & S. T. Samuel (Eds.), *Law and Principles of Consumer Protection* (p. 26). Lagos, Nigeria: Nigerian Institute of Advanced Legal Studies, Lagos, Nigeria.
- xix. OECD. (1999). Guidelines for Consumer Protection in the Context of Electronic Commerce. Organisation for Economic Co-Operation and Development. OECD. Retrieved from <http://www.oecd.org/internet/consumer/34023235.pdf>
- xx. Oluchi, A. (2015). Analysing the Adequacy of Electronic Transactions Bill 2015 in Facilitating E-Commerce in Nigeria. *Canadian Institute of Health Research*, 1–7. Retrieved from <http://ssrn.com/abstract=2651120> or <http://dx.doi.org/10.2139/ssrn.2651120>.
- xxi. Ozuru, H., Chikwe, J., & Amue, J. (2012). Consumer behaviour and online shopping adoption in Nigeria. In 13th Annual International Conference Casablanca, Morocco (Vol. 13, pp. 434–446).
- xxii. Sambo, A., & Garba, B. (2012). Electricity Generation and the Present Challenges in the Nigerian Power Sector. *Journal of Energy etc.* (2012): 1–17.
- xxiii. Tiwalade, A., Ray, D., & Firat, B. (2014). Privacy and Data Protection: The Effectiveness of a Government Regulation Approach in Developing Nations, Using Nigeria as a Case. In the 9th International Conference for the internet and Secured Transactions(ICITST) (pp. 234–239).
- xxiv. UNCITRAL. (2017). The Status of the UNCITRAL Model Law on Electronic Commerce 1996. Retrieved April 24, 2017, from [http://www.uncitral.org/uncitral/en/uncitral\\_texts/electronic\\_commerce/1996Model\\_status.html](http://www.uncitral.org/uncitral/en/uncitral_texts/electronic_commerce/1996Model_status.html)
- xxv. UNCTAD. (2015). Cyber Laws and Regulations for Enhancing E-commerce: Case Studies and Lessons Learned. United Nations Conference on Trade and Development. Geneva: UNCTAD Secretariat. Retrieved from [http://data.mti.go.ug/docs/UNCTAD\\_2004\\_TheImpactofFDIonDevelopment.pdf](http://data.mti.go.ug/docs/UNCTAD_2004_TheImpactofFDIonDevelopment.pdf).