Accra, Ghana–June 4, 2026

EXIM FROZEN FOODS ASSOCIATION OF GHANA SETS THE RECORD STRAIGHT, URGES THE MINISTRY OF TRANSPORT TO REJECT PRESSURES TO REINTRODUCE THE ABANDONED CTN/SPN PROJECT ESTIMATED TO COST GHANAIAN HOUSEHOLDS BETWEEN €187.2 MILLION and €382.8 MILLION PER ANNUM

A recent publication attributed to a group calling itself the *Concerned Traders Association of Ghana* raises more questions than answers. For an organisation that is unknown, unregistered and unaccountable to the very trading community it claims to represent, its sudden enthusiasm for the reintroduction of the Cargo Tracking Note (CTN) or Smart Port Note (SPN) is not only suspicious—it is deeply troubling.

For over a decade, Ghana's business community has been united and unequivocal in its rejection of the CTN/SPN regime. The system was abandoned because it was **needless, duplicative, expensive, an unnecessary burden on shippers and an avenue to siphon forex out of the country**. Every major stakeholder–importers, exporters, freight forwarders, logistics operators, CSOs–has consistently opposed it. So the question must be asked: why is a faceless group now championing a system that has been proven to harm the very traders it claims to speak for?

If this group truly represents traders, then its advocacy is baffling. No genuine trader or serious importer or responsible business association will push for a system that adds new charges, creates another needless bureaucracy on already overburdened shippers without adding any proven value; duplicates functions already performed by ICUMS and ultimately increases the cost of doing business at the port–the very things the Mahama Administration is committed to preventing.

It must be emphasised that a system purposely designed to gather data for the Ghana Shippers' Authority cannot, by any stretch of logic improve cargo visibility, enhance risk management or facilitate trade.

Data collection for GSA's internal administrative purposes is not trade facilitation. It is an internal housekeeping function, one that every MDA performs using its own budget. If GSA needs to digitalise its internal information-gathering processes, that is perfectly acceptable. But such digitalisation must be funded by GSA's own IGF (the 12 cedis collected from shippers for every single declaration), not through the imposition of new charges on the already overburdened trader.

Perhaps the most troubling aspect of the ECTN/SPN rollout is the arrangement between GSA and Inter-Ocean Maritime and Logistics Institute (IOMLI), which raises a fundamental question:

Why is the Ghana Shippers' Authority—an institution mandated to protect shippers' interests—partnering with a private entity to impose additional costs on the very shippers it is supposed to defend?

We have openly stated that the ECTN/SPN appears to be designed primarily to generate revenue for the service provider, contradicting the GSA's core mandate. In essence, the CTN/SPN is an illegitimate **profit-driven project**, not a trade-facilitation tool.

Based on a conservative analysis, the implementation of the CTN/SPN in Ghana is projected to cost Ghanaian shippers and by extension, Ghanaian households, **between €187.2 million and €382.8 million per annum.**

This financial burden represents a direct transfer of wealth to the service provider, Inter-Ocean Maritime and Logistics Institute and its Belgium-based technical partner, Antaser Afrique. The estimate is derived from the following:

- **Traffic Volume:** The total container traffic of 1,701,246 TEUs (Twenty-Foot Equivalent Units), as per 2024 port statistics.
- **Fee Basis:** The proposed SPN fee structure from the previous rollout attempt (available on the Antaser Afrique website).
- **Scope:** This calculation includes Full Container Load (FCL) traffic only and does not account for other types of cargo, meaning the total economic impact could be significantly higher.

The trading community, especially those of us in the food and beverage sub-sector, have made the point repeatedly for over a decade that the CTN/SPN does not solve any problem in Ghana's port ecosystem. It is an engineered solution in search of a non-existent problem only to burden us with more cost, which the final consumer bears.

This ill-advised move represents a dangerous regression in Ghana's efforts to modernize port operations, enhance trade facilitation, and reduce the cost of doing business. Having previously experienced resistance from the entire business community, stakeholders across the import, export, and logistics value chains are alarmed that such an outdated and inefficient mechanism is still being forcefully championed by this unknown and unverified group. This is clearly an attempt to mislead the public into believing that the CTN/SPN is beneficial. It undermines the collective efforts of legitimate trade associations that have fought for years to reduce port costs, eliminate illegitimate charges and improve the ease of doing business.

The Smart Port Note: A Primitive and Backward system

The Smart Port Note has had a long and unpleasant history in Ghana. It was originally introduced as a cargo tracking note but was abandoned due to widespread concerns over duplication of functions, high compliance costs, and delays in cargo clearance. Its reintroduction, under a new garb, does not address the fundamental flaws of the system. Instead, it

- Adds unnecessary bureaucratic layers to an already complex port clearance process;
- Increases transaction costs for importers, exporters, and freight forwarders, which will ultimately be passed on to Ghanaian consumers;
- Creates opportunities for delays and rent-seeking behaviors, undermining the gains made in port efficiency and transparency over recent years;

- Duplicates functions already effectively performed by the Integrated Customs Management System (ICUMS) and the Ghana Integrated Cargo Clearance System (GICCS).
- It is purported to provide already accessible and available data to GSA

Contrary to Trade Facilitation Best Practices

In an era where global trade is moving toward paperless, seamless, and predictable systems, the reintroduction of the CTN/SPN runs counter to the African Continental Free Trade Area (AfCFTA) principles and the World Trade Organization's Trade Facilitation Agreement. Ghana has positioned itself as a regional trade hub. This decision jeopardizes that reputation by signaling to the international business community that Ghana is willing to sacrifice efficiency for control.

Economic Consequences

The cumulative effect of this policy will be higher prices of goods, slower turnaround times at the ports, and a diminished competitive edge compared to neighboring ports such as Lomé or Abidjan. At a time when Ghanaian businesses and households are already grappling with economic pressures, any policy that artificially inflates the cost of imports is both counterproductive and punitive.

We therefore call on the Minister of Transport Hon. Joseph Bukari Nikpe to:

1. Resist any pressure to reintroduce the CTN/SPN;
2. Pursue genuine internal digitalization that fits its purpose within the GSA.;
3. Focus on enforcing its mandate such as relieving shippers of alien and illegitimate charges such as the Shipping lines administrative charges, empty container fees etc.
4. Rely on systems like ICUMS which already provide adequate cargo tracking and revenue assurance.

Conclusion

We conclude by stressing that if the so-called Concerned Traders Association of Ghana is truly concerned about traders, then there is a plethora of issues in the sector that demand attention. Here are a few ideas to get them started:

- The elimination of illegal and alien charges
- The enforcement of GSA's mandate under Act 1122
- The strengthening of ICUMS and other existing systems
- The reduction of bottlenecks in the clearance chain
- The protection of Ghanaian businesses from unnecessary financial burdens.

Whenever they are ready to help tackle real problems faced by traders daily, we are more than ready to join hands with them. But to insist on championing a system that traders have rejected for over a decade, they will not be tolerated.

Signed,
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