



# TRADE FACILITATION IN KENYA: PROGRESS, CHALLENGES, AND OPPORTUNITIES IN THE CONTEXT OF REGIONAL AND CONTINENTAL INTEGRATION

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## **Abstract**

*This article critically examines the state of trade facilitation in Kenya, highlighting the interplay between institutional reforms, infrastructure development, and regional integration commitments. Anchored within the framework of the WTO Trade Facilitation Agreement (TFA) and Kenya's obligations under the African Continental Free Trade Area (AfCFTA), the paper analyzes the progress and challenges of trade facilitation measures including customs modernization, digitization, and border agency coordination. Special attention is given to the inclusion of Micro, Small and Medium Enterprises (MSMEs), women, and youth — stakeholders often marginalized yet crucial to Kenya's trade ecosystem. Drawing on policy reviews, trade performance indices, and case studies from major trade corridors such as the Mombasa Port and Malaba border post, the article identifies key constraints such as corruption, infrastructural bottlenecks, and limited access to trade-enabling information. It proposes a set of inclusive, pragmatic policy recommendations to enhance efficiency, equity, and competitiveness in Kenya's trade facilitation landscape.*

*Keywords: Trade facilitation, Kenya, WTO Trade Facilitation Agreement, AfCFTA, MSMEs, women, youth, customs, regional integration, infrastructure*

## INTRODUCTION

Trade facilitation is now recognized as a cornerstone of modern trade policy, especially for developing countries seeking to integrate into global value chains. In Kenya, trade facilitation has gained momentum through domestic reforms and multilateral commitments such as the World Trade Organization Trade Facilitation Agreement (WTO TFA), which Kenya ratified in 2015 (UNCTAD, 2021). The WTO TFA obliges members to simplify, modernize, and harmonize export and import procedures, with a view to reducing trade costs and increasing transparency.

Kenya's focus on trade facilitation stems from both economic necessity and strategic ambition. As a gateway to the East and Central African region, and a member of the East African Community (EAC) and African Continental Free Trade Area (AfCFTA), Kenya's logistics, customs, and regulatory frameworks have far-reaching implications (African Union Commission, 2021). However, despite notable improvements—such as digitization of customs through the Integrated Customs Management System (iCMS) and the rollout of the Kenya National Electronic Single Window System (TradeNet) single window platform—traders still encounter bureaucracy, inconsistent border management, and lack of inclusivity for MSMEs, women, and youth (KenTrade, 2020; Transparency International Kenya, 2022).

### Research objectives

1. To examine the legal, policy, and institutional frameworks governing trade facilitation in Kenya, with particular reference to the WTO TFA and regional trade agreements such as AfCFTA.
2. To assess the performance of Kenya's trade facilitation systems, including customs modernization, single window platforms, and inter-agency coordination mechanisms.
3. To identify structural and operational challenges faced by marginalized groups, particularly MSMEs, women, and youth, in accessing and benefiting from trade facilitation reforms.
4. To explore opportunities for strengthening inclusive trade facilitation, through digital transformation, regional cooperation, and gender-responsive policy tools.
5. To recommend policy actions that enhance efficiency and equity in Kenya's trade facilitation ecosystem, supporting sustainable trade growth and integration into regional value chains.

## CONCEPTUAL AND POLICY FRAMEWORK

Trade facilitation encompasses measures that streamline the movement of goods across borders by simplifying procedures, enhancing transparency, and reducing transaction costs (OECD, 2020). In Kenya, the key frameworks shaping trade facilitation include:

- WTO TFA: Comprising binding and non-binding commitments across areas such as pre-arrival processing, publication of information, risk management, and expedited shipments (UNCTAD, 2021).
- Kenya National Trade Policy (2017): Emphasizes the importance of efficient logistics and customs in boosting competitiveness.
- Kenya Vision 2030: Identifies trade facilitation as a critical enabler for achieving economic transformation (World Bank, 2020).

The National Trade Facilitation Committee (NTFC) serves as the institutional mechanism for coordinating the implementation of trade facilitation measures. However, critiques have emerged about the NTFC's limited engagement with small traders and the informal sector (International Trade Centre, 2021).

## INSTITUTIONAL AND LEGAL DEVELOPMENTS

Since the ratification of the WTO TFA, Kenya has introduced a suite of institutional and legal reforms aimed at improving border efficiency and compliance. The Kenya Revenue Authority (KRA) has implemented the Integrated Customs Management System (iCMS), designed to automate cargo clearance and minimize human interaction (World Bank, 2020). Additionally, the Kenya Trade Network Agency (KenTrade) manages the Kenya National Electronic Single Window System (TradeNet), which serves as a centralized platform for processing trade documentation (KenTrade, 2020).

At the legal level, Kenya has amended various statutes to support the implementation of TFA measures. This includes the East African Community Customs Management Act (EACCMA) and new subsidiary legislation on risk-based inspections and authorized economic operators (OECD, 2020). The country has also adopted new regulations in line with the AfCFTA Protocols on Trade in Goods and Trade in Services, positioning itself to benefit from intra-African trade (African Union Commission, 2021).

Despite these strides, gaps remain in the enforcement of rules and in the capacity of decentralized agencies to implement reforms uniformly across all entry and exit points. Micro, Small and Medium Enterprises (MSMEs), particularly in rural and peri-urban areas, often lack access to the digital infrastructure needed to interface with TradeNet, exacerbating inequalities (International Trade Centre, 2021).

## PERFORMANCE ASSESSMENT

Assessing the effectiveness of trade facilitation in Kenya requires analysis of quantitative and qualitative indicators that reflect ease of trading across borders, efficiency of customs procedures, and the inclusiveness of trade reforms. Several global indices provide a comparative snapshot of Kenya's performance in these domains.

### World Bank's Doing Business Indicators

The Doing Business Report (World Bank, 2020) ranked Kenya 117<sup>th</sup> out of 190 countries in the category of *Trading Across Borders*. This ranking reflects the time and cost associated with documentary compliance and border compliance for both exports and imports. According to the most recent data from the World Bank's *Doing Business 2020* report, countries in Sub-Saharan Africa face substantial challenges with regard to border compliance for exports. On average, exporters in the region spend approximately 110.3 hours to complete border compliance procedures, at a cost of around US\$552.60 (World Bank, 2020). These figures represent the cumulative time and financial burdens linked to customs clearance, inspections, and the handling of goods at border points.

Kenya, however, significantly outperforms the regional average. The time required for export border compliance in Kenya is only 16 hours, and the cost is US\$143—far below the Sub-Saharan averages. This implies that Kenyan exporters complete compliance procedures nearly 85% faster and at over US\$400 less than their counterparts in the region (World Bank, 2020). This efficiency can be attributed to a range of reforms including the implementation of an electronic single-window system, modernization of port infrastructure, and streamlined customs processes.

Additionally, Kenya also demonstrates a relative advantage in documentary compliance, which involves the preparation, processing, and submission of required export documentation. In Kenya, this process takes 19 hours at a cost of US\$191, compared to a regional average of 98 hours and US\$246 respectively (World Bank, 2020).

In summary, Kenya stands out as a regional leader in reducing the time and cost of export border compliance. Its advancements provide a benchmark for other Sub-Saharan countries aiming to enhance trade competitiveness and facilitate smoother export procedures.

Notably, the implementation of the National Electronic Single Window System (TradeNet) contributed to a 20% reduction in clearance time over five years (KenTrade, 2020). However, Small and Medium Enterprises (SMEs) often report that the gains in speed are offset by a lack of user training and bureaucratic inefficiencies at lower administrative levels.

## Logistics Performance Index (LPI)

The Logistics Performance Index (LPI), developed by the World Bank, is a benchmarking tool that assesses countries' trade logistics efficiency across six core dimensions: customs performance, infrastructure quality, international shipments, logistics service quality, tracking and tracing, and timeliness. In 2018, Sub-Saharan Africa as a whole continued to lag behind global standards, with persistent infrastructural and institutional bottlenecks impacting its logistics competitiveness.

Across the continent, the average LPI score for Sub-Saharan Africa was estimated at between 2.43 and 2.45, on a scale from 1 (worst) to 5 (best) (World Bank, 2018a). Within the region, performance varied significantly across subregions. Eastern and Southern Africa reported an average LPI of 2.49, outperforming Western and Central Africa, which averaged 2.41 (World Bank, 2018b).

When broken down further, specific dimensions show marked disparities. For instance, infrastructure quality scored 2.24 in Eastern and Southern Africa, compared to 2.17 in Western and Central Africa. The quality of logistics services also differed slightly, with the former scoring 2.47 and the latter 2.32 (World Bank, 2018b). Interestingly, both subregions reported similar performance in arranging shipments (2.52) and relatively close scores for tracking and tracing consignments (2.54 for Eastern and Southern, 2.48 for Western and Central Africa) (World Bank, 2018c).

Kenya was among the top performers in the region, alongside South Africa, Côte d'Ivoire, Rwanda, and Tanzania. Kenya's overall LPI score stood at approximately 2.8, reflecting notable progress in trade logistics and customs reform (World Bank, 2018a). This score positions Kenya well above the regional averages and underscores its role as a logistics hub for East Africa as shown in Table 1.

Table 1: 2018 Logistics Performance Index (LPI) Scores – Sub-Saharan Africa and Kenya

Region / Country	Overall LPI	Infrastructure	Logistic Services	Shipments	Tracking
Eastern & Southern Africa (avg)	2.49	2.24	2.47	2.52	2.54
Western & Central Africa (avg)	2.41	2.17	2.32	2.52	2.48
<b>Kenya</b>	<b>≈2.8</b>				
<b>Sub-Saharan Africa (overall avg)</b>	<b>≈2.43–2.45</b>				

Source: World Bank. (2018)

The 2018 World Bank LPI data underscore persistent challenges in Sub-Saharan Africa's trade logistics environment. While countries like Kenya demonstrate above-average performance and emerging leadership in the region, overall logistics efficiency remains constrained by underdeveloped infrastructure and service quality. Enhancing performance across all six LPI pillars is crucial for boosting trade competitiveness and regional integration.

In the 2018 Logistics Performance Index, Kenya scored 2.8 out of 5, ranking 68th globally and 3rd in Sub-Saharan Africa after South Africa and Côte d'Ivoire (World Bank, 2018). Kenya performed well on customs (2.57), infrastructure (2.67), and logistics competence (2.78), but lower on timeliness (2.97) and tracking and tracing (2.66). This reflects an uneven performance, with progress at major trade hubs like Mombasa contrasting with bottlenecks at border posts and in hinterland logistics.

### **Trade Facilitation Indicators (OECD)**

Trade facilitation has become a cornerstone of economic integration and competitiveness in Sub-Saharan Africa, especially in light of commitments under the World Trade Organization's Trade Facilitation Agreement (TFA) and the African Continental Free Trade Area (AfCFTA). The OECD Trade Facilitation Indicators (TFIs) provide a comprehensive framework to assess the effectiveness of trade facilitation measures across 11 key dimensions, ranging from information availability to automation and border agency cooperation. These indicators are scored from 0 (no implementation) to 2 (full implementation), allowing for a comparative assessment across countries and regions.

According to the latest OECD data, the average implementation score for Sub-Saharan Africa across all TFI dimensions ranges between 0.8 and 1.2, indicating partial progress in trade facilitation but with significant room for improvement (OECD, 2025). The most improved areas over the past few years include domestic border agency cooperation, simplification and harmonization of documents, and automation of formalities. However, persistent challenges remain in areas such as international cooperation between border agencies and full-scale implementation of risk-based controls and advanced rulings (OECD, 2025).

Kenya stands out as one of the top performers in the region. The country has implemented a range of reforms aimed at improving border efficiency and reducing trade transaction costs. Central to these efforts is the Kenya National Electronic Single Window System (KenTrade), which streamlines documentation, approvals, and payments through a unified digital platform. Kenya also scores relatively high in information availability, automation, and domestic border agency cooperation (Table 2), reflecting both institutional commitment and technological advancement (KenTrade, 2024).

Table 2: OECD Trade Facilitation Indicator Scores – Sub-Saharan Africa and Kenya (2025)

Indicator Area	Sub-Saharan Africa (Avg.)	Kenya
Information availability	1.0	1.5
Simplification & harmonization of documents	0.9	1.4
Automation of formalities	0.8	1.3
Border agency cooperation (domestic)	0.85	1.5
Border agency cooperation (international)	0.8	1.2

Source: OECD. (2025)

The data underscores Kenya's position as a regional leader in trade facilitation, with scores consistently above the Sub-Saharan average. For instance, while the regional average for automation of formalities is 0.8, Kenya scores 1.3—demonstrating the effectiveness of its single window system and customs modernization initiatives. Similarly, in domestic border agency cooperation, Kenya's score of 1.5 reflects a strong inter-agency coordination framework facilitated by policy reforms and digital integration (OECD, 2025; KenTrade, 2024).

While Sub-Saharan Africa is steadily improving its trade facilitation landscape, much of the region continues to operate below global standards. Kenya's progress provides a model for other countries in the region, particularly in leveraging digital tools and institutional coordination to enhance trade efficiency. However, sustained investments and policy reforms are needed to achieve full implementation of the OECD TFI framework across the continent.

According to the OECD Trade Facilitation Indicators, Kenya scores particularly high in:

- Advance rulings
- Appeal procedures
- Automated border procedures

However, Kenya scores lower in external stakeholder consultation and cross-border agency cooperation — both of which are critical for inclusive trade facilitation (OECD, 2020). The lack of meaningful engagement with MSMEs, women's business associations, and youth networks during policy design and rollout continues to undermine reform ownership and practical impact.

### Informal Sector Exclusion

Kenya's formal metrics often obscure the experience of informal cross-border traders, who constitute a significant portion of trade actors, particularly along borders with Uganda and Tanzania. According to the East African Business Council (2021), women account for over 70%

of informal cross-border traders but face systemic challenges including bribery, arbitrary fines, and lack of documentation.

Inclusion efforts such as the Simplified Trade Regime (STR) under COMESA have yet to be fully operationalized in Kenya, resulting in continued marginalization of informal MSMEs and cross-border traders. These dynamics reveal a dual economy where formal trade improves while informal trade stagnates under institutional neglect.

## **CHALLENGES**

Despite notable progress, Kenya's trade facilitation landscape is constrained by a range of interrelated challenges that hinder the full realization of WTO TFA commitments and the broader objectives of inclusive and efficient trade. These challenges are rooted in governance gaps, infrastructural bottlenecks, regulatory complexity, and social inequalities.

### **Bureaucracy and Corruption**

Administrative red tape and corruption remain persistent issues in customs administration and border agency operations. Although digital systems like iCMS and TradeNet have reduced some physical interactions, enforcement loopholes and discretion-based practices continue to create rent-seeking opportunities (Transparency International Kenya, 2022). Traders, particularly smaller ones, report facing informal fees, selective inspections, and inconsistent interpretation of rules at various border posts.

According to the Kenya Association of Manufacturers (KAM), unpredictable customs clearance procedures and sudden regulatory changes raise costs and limit competitiveness for local exporters (KAM, 2023).

### **Poor Inter-agency Coordination**

Kenya's trade ecosystem involves over 35 government agencies, each with varying levels of digital integration and procedural mandates. The lack of seamless inter-agency communication undermines the goals of single window efficiency. Traders often face duplicated inspections, conflicting requirements, and delays caused by uncoordinated workflows.

The Border Control and Operations Coordination Committee (BCOCC), while designed to foster integrated border management, has limited legal authority to enforce harmonization across all actors (UNCTAD, 2021). This problem is exacerbated at land borders, where bilateral cooperation with neighbouring countries is required for operational alignment.

### **Infrastructure Gaps**

While Kenya has invested heavily in infrastructure — including the Standard Gauge Railway (SGR) and upgrades to the Port of Mombasa — several bottlenecks remain. Rural and hinterland road networks are often in poor condition, increasing the cost and time of moving goods to ports. Inland container depots (ICDs), such as the Naivasha terminal, suffer from low uptake due to logistical mismatches and lack of awareness among SMEs (World Bank, 2020).

Moreover, power outages, weak ICT infrastructure in remote regions, and limited access to high-speed internet impede the effectiveness of digital trade platforms.

### **Exclusion of MSMEs, Women, and Youth**

Kenya's trade facilitation reforms have not been sufficiently inclusive. MSMEs often operate in semi-formal settings and lack the resources or capacity to comply with formal trade procedures. Many lack basic knowledge of digital systems or face challenges accessing certification, licenses, and trade finance (International Trade Centre, 2021).

Women traders, particularly in border regions, are frequently subjected to gender-based violence, extortion, and discriminatory treatment by customs officers (African Union Commission, 2021). Moreover, most women are concentrated in sectors excluded from national value chain development strategies, such as low-margin agro-processing and informal retail.

Youth, despite being a significant entrepreneurial force in Kenya, remain disconnected from formal trade facilitation frameworks. Digital literacy, logistical capital, and awareness of trade procedures are low among youth-led enterprises. Programs such as Ajira Digital and Kenya Youth Employment Opportunities Project (KYEOP) lack clear integration with Kenya's trade policy ecosystem.

### **Inadequate Stakeholder Engagement**

While Kenya has formally established the National Trade Facilitation Committee (NTFC), its meetings and consultations are often dominated by large private sector actors, with limited participation from MSME associations, women's groups, or youth networks. As a result, policies and reforms may fail to reflect the realities faced by marginalized trade actors.

An inclusive approach would require institutionalizing stakeholder feedback mechanisms, conducting localized capacity-building sessions, and translating key policy materials into accessible formats and local languages.

## OPPORTUNITIES AND STRATEGIC REFORMS

Kenya stands at a pivotal moment in its trade facilitation journey. The convergence of new regional trade agreements, digital transformation, and rising global demand for inclusive and sustainable trade practices presents strategic opportunities. By aligning its trade facilitation agenda with these emerging trends, Kenya can unlock broad-based economic benefits and position itself as a continental leader in equitable trade governance.

### Leveraging AfCFTA Commitments

The African Continental Free Trade Area (AfCFTA) offers a powerful platform for deepening trade facilitation. Kenya is among the first countries to ratify and operationalize AfCFTA protocols, and it plays a leadership role in the AfCFTA Guided Trade Initiative.

AfCFTA provisions on trade facilitation—particularly Articles on coordinated border management, mutual recognition of standards, and simplification of customs documentation—are aligned with Kenya’s WTO TFA commitments (African Union Commission, 2021). However, the AfCFTA goes further by emphasizing development-linked goals such as:

- Supporting informal cross-border traders
- Promoting gender-responsive trade mechanisms
- Integrating MSMEs into regional value chains

Kenya can use this policy space to design cross-border trade facilitation programs tailored to women and youth, including the establishment of safe trade zones, harmonized border codes of conduct, and simplified procedures for low-value consignments.

### Advancing Digital Trade Infrastructure

The COVID-19 pandemic accelerated Kenya’s push toward digitization of trade procedures, and this momentum must now be institutionalized. Expanding the reach and functionality of platforms such as TradeNet and iCMS can significantly reduce costs for MSMEs and rural traders. Key reforms may include:

- Developing a mobile-friendly trade portal with real-time updates on procedures, duties, and NTBs (Non-Tariff Barriers)
- Establishing digital trade literacy programs targeting youth-led enterprises, especially in rural and peri-urban areas
- Promoting blockchain and data interoperability frameworks for cargo tracking and trade documentation

Moreover, digital public infrastructure should be co-designed with user feedback from underrepresented groups to ensure usability and accessibility.

### **Promoting Gender-Responsive Trade Facilitation**

To operationalize inclusive trade, Kenya must mainstream gender-responsive approaches within its trade facilitation strategies. This involves more than targeted programs — it requires redesigning systems to account for structural gender inequalities. Key entry points include:

- Gender audits of customs procedures and inspection protocols
- Capacity-building for border agents on women’s rights and non-discrimination
- Inclusion of women’s business associations in national trade policy consultations
- Developing sex-disaggregated trade data to monitor impact

Kenya can draw lessons from initiatives such as Rwanda’s gender desks at border posts or Malawi’s women-only customs lanes, adapting these innovations to local contexts.

### **MSME-Centered Policy Design**

MSMEs are often the most responsive to improvements in trade efficiency — but also the most vulnerable to policy neglect. Kenya can adopt MSME-centric trade facilitation reforms, including:

- Dedicated help desks and contact points within customs
- Standardized and simplified forms for low-volume traders
- Waivers or subsidies for first-time exporters
- Public procurement targets favoring youth and women-owned MSMEs

Such measures should be embedded into the NTFC’s workplan and monitored through regular, disaggregated impact assessments.

### **Regional Cooperation and Knowledge Exchange**

Kenya has an opportunity to spearhead regional best practice exchange under the auspices of the AfCFTA and EAC. This includes:

- Joint training for customs officials across borders
- Interoperable data-sharing on cargo movement and risk profiles
- Peer learning platforms for NTFCs across East Africa

Strengthening bilateral trade facilitation protocols with neighboring countries—particularly Uganda and Tanzania—can help decongest border posts and harmonize procedures, improving overall trade flow in the region.

## CONCLUSION AND POLICY RECOMMENDATIONS

Kenya has made significant progress in advancing trade facilitation reforms aligned with the WTO Trade Facilitation Agreement (TFA) and regional integration frameworks such as the AfCFTA. These reforms—ranging from the modernization of the Port of Mombasa to the digitization of customs procedures through the iCMS and TradeNet platforms—have contributed to greater trade efficiency, transparency, and reduced transaction costs. However, structural challenges such as bureaucratic inertia, corruption, inter-agency fragmentation, and infrastructure gaps continue to hinder optimal implementation. More critically, the benefits of trade facilitation remain unevenly distributed, with micro, small and medium enterprises (MSMEs), women, and youth often excluded from the mainstream formal trade environment. Without deliberate, inclusive policy design, these stakeholders will remain on the periphery of Kenya’s trade expansion narrative.

To build a more equitable and efficient trade ecosystem, Kenya must strengthen the institutional governance of trade facilitation. The National Trade Facilitation Committee (NTFC) should be restructured to ensure meaningful participation of women’s associations, youth networks, and MSME representatives. This would enhance policy ownership, improve relevance, and foster greater compliance among marginalized trade actors. Regular multi-stakeholder forums and feedback loops should be institutionalized to allow for continuous adaptation of policies based on real-time challenges at the border and in domestic supply chains.

Moreover, digital transformation must be pursued not only as a technological upgrade but as a democratizing tool. Mobile-friendly trade applications, e-learning modules on trade procedures, and multilingual helpdesks can bring informal and small-scale traders into the formal economy. Government should collaborate with the private sector and development partners to expand digital literacy and access to reliable internet infrastructure, particularly in rural and underserved areas. Linking trade digitalization to youth employment programs such as Ajira Digital can amplify the socioeconomic returns of these investments.

Kenya also needs to embed gender-responsive and youth-inclusive frameworks into the heart of its trade facilitation reforms. This means conducting gender audits of customs operations, training border officials on respectful and equitable treatment of all traders, and establishing grievance redress mechanisms tailored to vulnerable groups. Dedicated infrastructure—such as safe trading zones, child-care facilities at border points, and women-friendly inspection protocols—can create a more enabling environment for women and youth to thrive in cross-border commerce.

From a regional perspective, Kenya should leverage the AfCFTA not merely as a market access mechanism but as a platform for institutional transformation. Active participation in the AfCFTA Working Groups on trade facilitation, customs cooperation, and non-tariff barriers can allow Kenya to shape continental norms in ways that reflect its domestic priorities. Regional peer learning among National Trade Facilitation Committees (NTFCs) and harmonized training for customs officials across East Africa can help operationalize the goal of coordinated and inclusive trade systems.

Finally, monitoring and evaluation frameworks must evolve to include metrics on equity and inclusivity. Beyond measuring clearance times and logistics costs, Kenya should track the number of MSMEs using formal trade systems, the percentage of women traders accessing simplified trade regimes, and the involvement of youth in trade-related consultations. Data disaggregation by gender, age, enterprise size, and geography will be essential for ensuring that trade facilitation does not merely accelerate commerce but also advances Kenya's broader development and inclusion agenda.

## LIMITATIONS OF THE STUDY

This study provides a comprehensive analysis of trade facilitation in Kenya; however, it is subject to several limitations. The reliance on secondary data restricts the ability to capture the real-time experiences of traders, especially those operating informally. Much of the data referenced is aggregated, limiting nuanced insights into how trade facilitation measures affect diverse groups such as women, youth, and MSMEs. While the informal sector is acknowledged, its complex dynamics remain underexplored due to limited empirical data. The rapid evolution of trade policy and technology in Kenya also poses temporal limitations, with the study potentially omitting the most recent developments. Furthermore, the analysis is largely policy-centric, emphasizing institutional reforms while overlooking local and informal governance arrangements. The absence of participatory methods such as stakeholder interviews or fieldwork further constrains the depth of the study, as it relies on documented trends rather than lived experiences. Despite these constraints, the paper contributes significantly to the policy discourse on trade facilitation and inclusion in Kenya.

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