



E-Commerce **Challenges**

Facing Yemeni Entrepreneurs

— Policy Paper —

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November 2022



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About project:

Research Guidance Project (RGP), implemented by Resonate! Yemen with funding from Project on Middle East Democracy (POMED), aims at promoting youth role through engaging them in public policymaking and supporting Yemen's peacebuilding process to enable youth to influence public policies and solve problems related to community cohesion and local governance. This effort is within Resonate! strategic goal of promoting youth voices and bringing them to decision-making positions.

Executive Summary

Many Yemeni entrepreneurs have recently turned to internet commerce (e-commerce) to improve their livelihood and generate income. E-marketing pages widely spread across social media platforms, and e-commerce apps were launched, including food delivery, service, delivery and other apps, which are easily accessed using a mobile phone or a computer. However, the e-commerce environment in Yemen is still underdeveloped compared to the activity volume, which puts entrepreneurs in the face of multiple challenges, undermining their commercial aspirations as well as the e-commerce expansion. This paper outlined several legal, organizational, technological, financial and other challenges facing e-commerce entrepreneurs. It also concluded recommendations, including establishing a legal environment and regulations for the e-commerce activity; improving the Information and Communications Technology (ICT) infrastructure; providing financial and technical support and others. These recommendations should be actioned by the public and private sectors and civil society organizations (CSOs) to improve and encourage e-commerce.

Key words: e-commerce, entrepreneurs, Yemen, challenges.

Introduction

Despite the adverse effects of war on the Yemeni economy, leading many Yemenis to lose their jobs, poor commercial activity and high unemployment rates, there is a sub-economic activity making rapid growth, with many entrepreneurs, whether individuals or startups¹, joining it. This activity is internet commerce (also known as e-commerce). This activity is accessed through e-commerce websites,

mobile phone apps or e-marketing pages on social media platforms, such as Facebook, WhatsApp, Telegram, etc.

Up to 2021, the Ministry of Industry and Trade (MIT) in Sana'a registered (100) commercial registers for e-marketing activities². There is also a big number of unregistered commercial activities such as mobile apps or social media pages and groups on Facebook, WhatsApp, etc.

This growing activity has raised many questions and challenges about the readiness of Yemen for e-commerce. This also raises questions about the government's role in responding to this activity in terms of regulating and encouraging the e-commerce environment, and what challenges face e-commerce platforms and customers in Yemen.

This paper aimed to identify the obstacles facing Yemen e-commerce entrepreneurs as well as opportunities for expanding e-commerce in Yemen.

The paper was prepared during August-October 2022. The data was mainly collected through (9) interviews, including (3) Zoom interviews and (6) face-to-face interviews (7 males and 2 females). It targeted e-commerce entrepreneurs who manage commercial websites and owners of mobile apps as well as experts and CSOs involved in ICT and economic activities. In addition, field visits were conducted to the MIT and its branch offices, during which discussions were held with the staff responsible for the entrepreneur window. The paper also involved a desk review of relevant local and international reports and studies.

Background

Information and Communication Technology (ICT) has created a new reality for economic activities, not only for Yemen but also for the whole world. In today's world, countries, governments and organizations are increasingly interested in E-commerce as an engine for economic development³ for its economic and development benefits for individuals and communities. The ICT also helps build awareness and culture for using technology in commercial activities.

The United Nations Conference on Trade and Development (UNCTAD) defines e-commerce as the process of purchases and sales of services or goods using websites, mobile phones, laptops, or via e-mail. E-commerce practitioners include individuals, governments, entrepreneurs, and public or private organizations.⁴

In Yemen, there is no data about the volume and scope of e-commerce activity, but many such activities could be seen conducted by trading and technical companies as well as businessmen. However, it remains a small activity compared to other Arab countries such as Saudi Arabia, Jordan or UAE, as Yemen ranked (138) out of (152) countries in the e-commerce index (Business-to-consumer "B2C") of the "e-Trade For All Initiative" launched by the UNCTAD in 2017.⁵ This poses great challenges to the government to get more involved in providing enabling environment for e-commerce, including the legal environment regulating e-commerce activity, ICT infrastructure, payment systems, electronic transactions, information protection and cybersecurity.

Key Challenges and Difficulties

Yemeni entrepreneurs interested in e-commerce face many challenges related to the e-commerce environment and to several other factors, including:

1. Poor government's interest in e-commerce:

The government's role in e-commerce raises a question about how the government is developed in terms of ICT use in conducting business and providing services to citizens (electronic government), especially in developing countries, including Yemen, given that the most important elements of establishing e-commerce rely on ICT.

Thus, the relationship between e-government and ICT-based e-commerce becomes clear as two major ICT applications.⁶

The improvement of Yemen's application of e-government could be an essential starting point for the promotion and

growth of e-commerce activity. The progress in the application of e-government reflects the development in communications infrastructure, the provision of online services, the improvement in education and the decrease in illiteracy rate.⁷ All of these are key elements in improving the e-commerce environment because the government at this level has reached the required level of digital transformation in its organizational structure and has achieved the required level of digital transformation at the community level that e-commerce needs.

“The absence of clear government interest in e-government and the adoption of e-commerce delays reaping benefits from e-commerce as an effective option to reduce unemployment and revive the economy through pioneering projects.”

This highlights the difficulty faced by e-commerce in Yemen in terms of government's failure to achieve the required transformation towards the application of e-government. Although Yemen has adopted the e-government since 2003, it is still ranked low in the e-government survey issued by the United Nations in 2020. Yemen ranks 173 out of 193 countries in the e-government development index (EGDI).⁸

In general, the failure to implement clear plans and programs for the transformation towards the e-government in Yemen is the primary difficulty that e-commerce can face at all levels, which will be further explained in the other difficulties and problems. The e-government has a major role in facilitating the provision of services and in preparing the community to adopt digital transformation or become an information society. However, this aspect remains far from the government's plans.

Although there exist plans and programs, none of them have been implemented. For example, the Ministry of Telecommunications & Information Technology (MTIT) adopted the National Information Technology Program in 2003, including the e-government and e-commerce, which did not see the light of day. Likewise, the National Information Center (NIC) adopted the National Information Network Project in 2007, which is the core for the e-government. However, the project progress remained limited, as the institutional conflict between the NIC and MTIT over the leadership of the e-government project impeded the application of e-government.

Although an agreement was later made between the NIC and MTIT on the e-government project document sponsored by the Cabinet General Secretariat and ESCWA in 2009, the document remained a dead letter to this day.⁹

2. Absence of laws governing e-commerce:

Legal and regulatory frameworks create a stimulating environment for e-commerce activity. Such frameworks provide an official cover for commercial activities through various electronic means, especially the Internet; provide regulations and guidelines regulating the e-commerce market; and protect the rights of all stakeholders, including consumers, service providers and producers.

As of writing this paper, there is no law regulating e-commerce, although the MIT has announced a committee to draft a bill regulating e-commerce during the Second E-commerce Conference in 2021¹⁰, but the bill has not been issued.¹¹ On the other hand, many of the interviewees did not know about any laws, procedures or even official decisions that could be used to regulate e-commerce, and they did not know about the MIT e-commerce conference held in 2021. This indicates the poor MIT performance in promoting and encouraging such momentum and providing the opportunity for stakeholders to actively participate in drafting the law. The conference was limited to a very small number of e-commerce entrepreneurs and owners of technology companies.¹² Also, many of those surveyed do not trust the promises made by the MIT regarding issuing a law on e-commerce.¹³

The absence of a law or policies regulating e-commerce is a major difficulty facing e-commerce activity in Yemen. A male respondent explained that e-commerce in Yemen is growing but undermined by the absence of law, as the MIT cannot facilitate or provide procedures serving e-commerce entrepreneurs due to the absence of a regulatory reference. Therefore, the availability of laws and policies does not only protect e-commerce practitioners, whether sellers or shoppers, but also preserve the state's revenues such as taxes, customs, etc.¹⁴ Another male respondent believed that the lack of a law creates mistrust among people to deal with online business activities. On the other hand, the existence of a law can provide trust among people and thus creates a large base of customers, which would further the expansion of e-commerce activity in general.¹⁵

It is noteworthy that the current legislative environment in Yemen is very poor in addressing e-commerce issues, especially consumer protection, fraud and hacking, despite the existence of Law No. 40 of 2006 Regarding Electronic Payment Systems and Financial and Banking Operations¹⁶, which is the only law indirectly supporting e-commerce, as this law recognizes e-payments and provides legitimacy for electronic signatures and transactions.¹⁷ However, the articles of this law do not provide procedures for the collection of evidence for cybercrimes, which constitutes an obstacle to the use and deployment of e-payment systems, and thus directly affects e-commerce activity.¹⁸

The Consumer Protection Law (CPL) “Article No. (4)” referred in its objectives to the subject of e-commerce, “the provisions of Consumer Protection Law apply to e-commerce activity.”¹⁹ However, the law did not address issues of fraud, data protection and consumer online privacy. Many of the law provisions do not also apply to e-commerce activity, such as the provisions of goods seizure and examination, as the law assumes the physical existence of industrial or commercial facilities and goods that could be visited or physically inspected. This assumption does not apply to e-commerce with virtual stores. Thus, the penalties stated in the CPL are inapplicable to e-commerce activity due to the difficulty of substantiating violations based on the listed provisions of seizure and inspection, especially with the absence of a special law for cybercrimes. E-commerce requires a comprehensive vision and real political will to be adopted and encouraged, and to address the issues created by online transactions, including providing legal and regulatory environment for e-commerce, i.e., issuing a law on e-commerce, approving the cybercrime law, amending the CPL to include aspects of E-commerce, and drafting policies and guidelines for regulating e-commerce. However, this is still far-reaching in Yemen.

“The absence of a law on e-commerce and cybercrime with the current laws and regulations lagging behind the nature and scale of e-commerce creates mistrust and uncertainty for entrepreneurs.”

3. Growing activity and poor official response to e-commerce activities

Up to 2021, the MIT registered (100) commercial registers under "e-marketing" activity.²⁰ In 2018, the MIT created an "entrepreneur" window, which aimed to grant official licenses to project owners, especially small enterprises, including e-commerce activities.²¹ However, this window does not adequately respond to the growing e-commerce activity. The licenses issued by MIT to the owners of online projects are temporary, i.e., temporary commercial registration according to the MIT service guide.²² Such temporary licenses are only issued to reserve the brand name but do not grant the right to company ownership²³, which reflects the poor official interest in e-commerce activity. The e-commerce is not a priority to the MIT. Additionally, the e-commerce activity does not have any administrative or legal justification. The MIT's Regulation No. (284) of 2009²⁴ did not refer to any legal articles within its strategic or overall objectives to regulate e-commerce. There is no regulatory component for e-commerce in the MIT's administrative and organizational structure at any level.

The e-commerce registration procedures are the same as normal commercial activities because there is no law for such activities or policies to regulate the registration procedures. Many respondents considered this an obstacle to their enterprises because they need to pay obligations such as taxes and insurance. This should not be the case for online business activities, which make humble income and need long time to grow.²⁵ A

female respondent indicated that the licenses for online business issued by the MIT are invalid and do not enable opening a bank account in the name of the online activity. Such licenses do not also allow applying for tenders, which affects the growth of e-commerce activity.²⁶

The MIT does not have a list to classify the activities that fall under the name of entrepreneurial activities or projects provided by the MIT Entrepreneur Window, which is open for people for registration. A male respondent indicated that the entrepreneurial activities that could be granted a commercial register by the MIT had been reduced from four to one activity, which is "e-marketing". Moreover, the classification or cancellation of these activities takes place without any legal or regulatory grounds. This impairs the growth and expansion of e-commerce and undermines the official registration of e-commerce activities.²⁷

4. Funding and support challenges

Most interviewed entrepreneurs confirmed facing difficulties in obtaining financing for their online businesses. They added that they sought funding from relatives and friends to finance their business activities. Abdullah Al-Khudri said that he managed his e-activity by himself because he was unable to hire other people to help him due to the high marketing costs, and that unlike many Arab and developing countries, there was no public support for e-commerce activities. Al-Khudri added that there are no investment awards or incentives from the MIT for pioneering

enterprises. Also, the MIT does not link or introduce investors to e-commerce entrepreneurs.²⁸



The absence of financing and support policies and plans for e-commerce enterprises by government, private sector and local and international organizations undermines the expansion and success of business activities.



The owner of MenOnly online store mentioned that banks impose complex conditions for obtaining a loan to finance her business, including a collateral and high interest rate.²⁹ Hamdi Shaher confirmed that local and international organizations do not provide any support for such enterprises for reasons

related to the donor. In addition, to get funding from other sources, it is necessary to have trust and belief in the business idea, and it is difficult to obtain financing from business incubators or banks because they require a collateral equivalent to the loan amount, which renders it useless.³⁰

Eman Al-Maqtari highlighted the difficulty of accessing e investors interested in e-commerce due to the fear of risking engaging in this type of activity as well as the lack of understanding the nature of e-commerce activity. This affected her e-business greatly, which made her change her business from an e-platform to a physical office.³¹

Entrepreneurs in tech companies conducting e-commerce face funding and support challenges. According to ROWAD Foundation survey results on tech startups, which included (68) tech startups in six Yemeni governorates, it was found that these startups did not receive official financial support

from government agencies. The source of capital for tech startups was (3%) from banks, (1%) from NGOs, (9%) from investors and (69%) from personal savings, family and friends.³² Thus, there is a clear absence of the government's vision and policies regarding supporting and promoting the growing e-commerce activity in Yemen, which needs significant support and encouragement as in other countries.

5. Illiteracy, culture and awareness challenges

Culture and awareness of e-commerce as well as information and computer technology are significant to promote the online business environment, especially that the e-commerce experience is still in its infancy in Yemen. The high rate of illiteracy reached 45% of the population,³³ which makes it difficult to spread the culture of e-commerce. There is also underuse of computing and computer applications among community members due to computer and technical illiteracy, which makes up to 75% of the population.³⁴

All interviewed respondents agreed that the poor community awareness and knowledge of e-commerce and online business are among the key current and future obstacles that threaten e-commerce activity, whether at the community or public institutions levels.

The lack of awareness of such issues creates a fear of change among the community to deal with online businesses. This produces significant challenges for entrepreneurs in terms of time and money and increases risk. The main difficulty that



Awareness of the importance of e-commerce, the level of education and computer illiteracy among community is essential to the success and prosperity of e-commerce activity at the state and community levels.



Hamdi Shaher faced when starting his business "Wajabat App" was awareness and education, and how to convince the community of the online delivery service, which took him big time and money.³⁵

The risk increases when starting an online business activity. Abdullah Al-Khudri believes that what makes most of the online business ideas different is that they are new and unique, unlike the current businesses such as physical stores or hospitals. This was one of the key difficulties he faced because it increased risk severity when starting his online business.³⁶

This highlights the role governments can play in the field of education through applying e-government, as it can bridge the digital gap between citizens. The level of education determines competence in digital skills, which makes using the internet to access businesses more acceptable.³⁷

6. Poor e-payment services

Electronic payment is the master link in the e-commerce chain, as it provides an accessible and fast method for consumers and e-commerce practitioners to conduct financial transactions for online purchases and sales. In developing countries, especially Yemen, e-payment represents the first step to enhancing the financial inclusion

of community members and expanding e-commerce worldwide.³⁸

In Yemen, one of the difficulties facing e-commerce is the poor e-payment services furnished by banks and financial institutions. Banks do not deploy e-payment service points through online platforms, i.e., payments are made directly from the customer's account to the online store account, and this is due to cybersecurity risks.³⁹

Some banks also blocked online transactions for their customers, while some provided very limited services such as browsing one's balance and transaction history. However, the customer bears the brunt of any fraud or hacking incident, while the bank keeps itself away from any responsibility.⁴⁰

In addition to the poor financial inclusion in Yemen, the percentage of those who own a bank account is less than 10%, which is a very small percentage compared to the total population of 29.6 million people⁴¹, of which e-money payment accounts constitute 27%. Women own only 2% of bank accounts.⁴²

Bank account holders exist mainly in cities (93.8%) and only 6% exist in rural areas.⁴³ This is due to the existence of banks and their branch offices in cities and urban areas, making access to banking services negligible for about 73% of Yemenis living in rural communities, in addition to the high rates of illiteracy and poverty among the population, i.e., 45% and 50% respectively.⁴⁴

This cripples the expansion of e-commerce activity across Yemen.

Even with the recent emergence of e-wallets, conducting online transactions through e-wallets is very limited. Online purchases accounted for (13%) of total payments between 2016-2019, while cash withdrawals accounted for (59%), and paying phone and internet bills accounted for (26%).⁴⁵

From a legal standpoint, there is no legal framework for establishing an e-payment system. The current laws or instructions related to e-commerce that are issued by the Bank of Sana'a or the Bank of Aden only define the central bank's responsibility for determining the tasks, conditions and authorities of e-service providers and issuing licenses for service providers.⁴⁶

In addition, the division of the Central Bank of Yemen (CBY) between Sana'a and Aden is one of the main obstacles in the banking sector, indirectly affecting the improvement of the e-commerce environment.

7. Poor ICT infrastructure and services

The poor internet connectivity and ICT infrastructure represent a significant impediment to e-commerce in Yemen. A male respondent running an e-commerce enterprise indicated that frequent internet connectivity interruption is a key obstacle to internet-based commerce in Yemen.⁴⁷ Another male respondent indicated that the internet outage that took place in Yemen at the outset of 2020 which lasted for 59 days had

destructive effect on his enterprise "Wajabat App" and made him start again from scratch.⁴⁸

Ahmed Abdel Mawla⁴⁹ and Eman Al-Maqtari⁵⁰ added that the poor internet connectivity and high cost of service are the main problems facing e-commerce. The cost of internet access in Yemen is the highest in the Arab world, as one gigabyte could cost 15.98 USD.⁵¹ This makes internet access unavailable to a large population, compared to per capita income⁵². In addition, most of the rural areas in Yemen are out of the telecom and internet grid,⁵³ and the non-commercial internet user community in Yemen makes 26% of the population, which is a very small percentage, i.e., 40% less than the global average of 66%, and 50% less than the average in Arab countries.⁵⁴

Eman Al-Maqtari also mentioned that the state's monopoly over internet services in Yemen through TeleYemen and the Public Telecommunications Corporation (PTC) is discouraging the growth of e-commerce. The private sector companies are unable to provide quality internet services at an affordable price to the entire population due to the absence of competitive environment.⁵⁵ Also, the Telecommunications Legal Framework No. (38) of 1991 does not represent a comprehensive legal reference for private providers of mobile phone and internet services, which makes the telecommunication competitive environment limited and thus hinders investment.⁵⁶

The war has largely affected the ICT infrastructure

across Yemen. According to statistics published by Sana'a government on losses and damages incurred by MTIT and its offices, the war destroyed many ICT infrastructure facilities of the public and private sectors, with a total cost of \$6.7 billion. This deprived more than 1.2 million citizens of telecom and internet services. Around 14 million users suffer from poor telecom and internet services, and over 1.5 million citizens no longer have access to telecom and internet services.⁵⁷

Thus, the adoption of e-commerce in Yemen is very low. The responsiveness of government and MIT to e-commerce is very poor, with no clear support. The MIT provides no special law or clear policies regulating e-commerce activity. There are also no laws for cybercrime, and there are no specific legal articles or policies within CPL addressing in detail consumer protection in relation to e-commerce. The poor ICT infrastructure does not provide appropriate environment for the prosperity of e-commerce. Illiteracy and poor culture and awareness among people are challenges undermining the development of e-commerce activities, worsened by prolonged war.

Recommendations

Based on the analysis of e-commerce challenges in Yemen, key recommendations to overcome or mitigate these challenges include:

1. Boosting transformation towards e-commerce will require the MIT to conduct more studies and researches on the nature and scale of e-commerce activity in Yemen. An assessment study can also be conducted to identify opportunities and challenges in e-commerce through support from the UNCTAD “e-Trade For All initiative”, launched in 2017.
2. Develop a matrix of technical and technology needs to help e-commerce thrive with joint efforts from MIT and MTIT as well as relevant entrepreneurs, private sector and organizations.
3. Draft legislation and policies for e-commerce in a participatory manner with all official and unofficial stakeholders, including private sector, entrepreneurs and CSOs.
4. Through cooperation between the MIT, the Central Bank (CBY), the MTIT and the Federation of Yemen Chambers of Commerce and Industry (FYCCI), introduce a platform for registering e-commerce activities as a starting point to facilitate the process of e-business registration to formalize such activities.
5. Establish an administrative entity or a technical unit at the MIT to manage e-commerce activities; define the aspects and scope of e-commerce activities; provide guidelines, which should be made available on the MIT's website; and provide sufficient statistics and information on e-commerce activities and opportunities.

6. The CBY and MTIT should introduce a national support program for developing e-commerce to provide funding and soft loans to entrepreneurs.
 7. Provide internet and communication services at affordable prices across Yemen.
 8. Encourage businessmen and the private sector to support e-commerce enterprises through advocacy and awareness campaigns to be conducted by the MIT and local CSOs.
 9. Conduct awareness campaigns to raise community awareness of the importance and benefits of e-commerce through TV and radio as well as seminars and conferences.
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About Resonate! Yemen

Resonate! Yemen is a non-profit NGO that has commenced working as a youth initiative in January 2010 and was officially registered at the Ministry of Social Affairs in August 2011, The Foundation is working to create a new environment conducive for developing more sustainable policies, where young people as are engaged as key partners in the development and evaluation of public policies. Resonate! Yemen aims to make the voices of Yemeni youth part of the policy discourse in Yemen, and to support youth work at national and international levels.



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