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REGULATORY OVERSIGHT IN NIGERIA'S PAYMENT INDUSTRY: LEGAL GAPS, ENFORCEMENT TRENDS, AND THE INNOVATION-COMPLIANCE DILEMMA

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ABSTRACT

This article critically examines the regulatory framework governing Nigeria's rapidly evolving payment industry, with a focus on the intersection between technological innovation and compliance obligations. It explores the legal architecture instituted by the Central Bank of Nigeria (CBN), alongside other relevant regulators such as the Securities and Exchange Commission (SEC), National Data Protection Commission (NDPC), Nigeria Deposit Insurance Corporation (NDIC) and Nigerian Communications Commission (NCC). The study analyses the classification and capital requirements for various licensing categories under the New License Categorisation for the Nigerian Payment System 2020. The Paystack Zap case is adopted as a contemporary case study to highlight regulatory breaches arising from innovation outpacing regulation. It demonstrates how regulatory infractions, such as exceeding the bounds of switching licenses to engage in wallet-like operations, attract significant penalties and enforcement action. Despite the robust regulatory structure, challenges such as regulatory complexity, fragmented oversight, and infrastructural limitations persist. The article concludes with strategic recommendations aimed at fostering regulatory clarity, promoting innovation, and enhancing supervisory efficiency in Nigeria's financial ecosystem.

1.0 INTRODUCTION

Nigeria's payment system has experienced a significant shift from traditional cash-based exchanges to advanced digital platforms, mirroring global trends in financial technology adoption.[1] This progress is supported by the Central Bank of Nigeria's regulatory framework, established under the Banks and Other Financial Institutions Act (BOFIA) 2020.[2] The Nigerian payment system, described as "an established infrastructure comprising institutions, rules, procedures, standards, and computer networks that facilitate the transfer of value between parties discharging mutual obligations," has become a vital part of Nigeria's financial ecosystem, promoting financial inclusion while also creating new regulatory challenges.[3]

The regulatory landscape governing Nigeria's payment industry involves multiple agencies with overlapping jurisdictions, creating a complex compliance environment for market participants.[4] This multi-regulatory approach, while comprehensive, has generated challenges in coordination, clarity, and efficiency that warrant critical examination. The emergence of innovative payment solutions continues to test existing regulatory frameworks, as evidenced by high-profile enforcement actions against major fintech operators.[5]

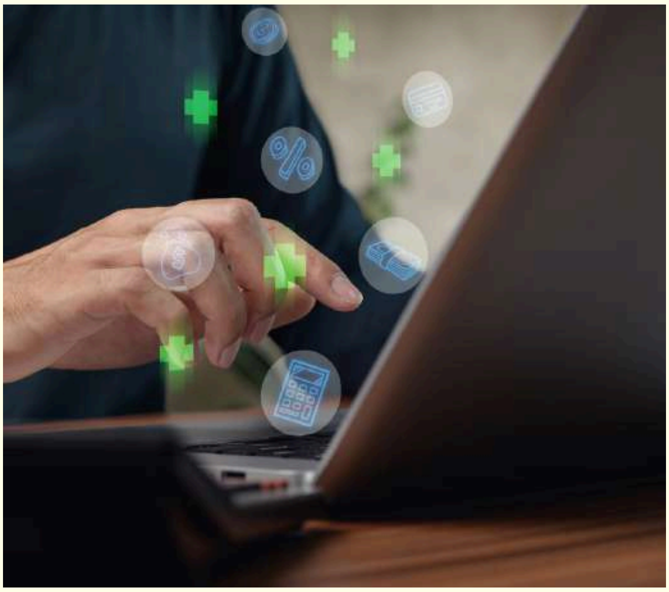
1.1 Role of Technology and Innovation in Nigeria's Payment Industry

The Nigerian payment industry is undergoing rapid digital transformation, driven by:

I. Increased smartphone usage and wider mobile internet access that have supported rapid fintech adoption and expanded use of digital payment channels

II. Growing fintech adoption; and

III. Implementation of the Central Bank of Nigeria's Cashless Policy Guidelines (2020).



While cash remains prevalent, digital payment methods now dominate, with Electronic transfers, instant payments and mobile channels accounting for a large percentage of payment transactions, and industry data (including NIBSS reports), show year-on

[1] Central Bank of Nigeria, 'Payment System Vision 2025' (2020) 15 <https://www.cbn.gov.ng/out/2022/ccd/psmd%20vision%202025%20edited%20final.pdf> accessed 21st July, 2025

[2] Sections 57 of the Banks and Other Financial Institutions Act 2020

[3] CBN, 'Guidelines on Operations of Electronic Payment Channels in Nigeria' (2021), < https://www.cbn.gov.ng/out/2020/ccd/reviewed%20and%20approved%20guidelines%20on%20operations%20of%20electronic%20payment%20channels%20in%20nigeria%202020.pdf> accessed 21st July, 2025

[4] Qeeva Advisory, 'Understanding The Regulatory Landscape for Fintech in Nigeria' 2024 <https://qeeva.com/understanding-the-regulatory-landscape-for-fintech-in-nigeria/> accessed 21st July, 2025

[5] TechCabal, 'CBN fines Paystack ₦250 Million over Zap operations, citing licencing breach' 2025 < https://techcabal.com/2025/04/30/cbn-fines-paystack/> accessed 21st July, 2025

-year growth. The NIBSS Instant Payment Platform saw transaction volume rise 613.1% (729.2 million to 5.2 billion) and value grow 381.5% (₦80.4 trillion to ₦387.1 trillion) between 2018-2022, demonstrating rapid nationwide adoption.[6]
Fintech services, defined by CBN's 2021 Framework as digital financial solutions, are now vital to Nigeria's financial system. Growth stems from both technology and regulatory support, particularly through BOFIA 2020 and Nigeria Data Protection Act 2023, which establish legal frameworks while protecting consumers.

2.0 REGULATORY FRAMEWORK FOR NIGERIA'S PAYMENT SYSTEM

The Nigerian payment system operates under a multi-institutional regulatory framework. There is the primary regulatory authority which is the Central Bank of Nigeria (CBN) and other specialized regulatory authorities such as the Securities and Exchange Commission (SEC), the National Data Protection Commission (NDPC), Nigeria Deposit Insurance Corporation (NDIC) and the National Information Technology Development Agency (NITDA).

2.1 The Primary Regulatory Authority: The Central Bank of Nigeria (CBN)

The Central Bank of Nigeria serves as the apex regulator of Nigeria's payment system, deriving its authority from the CBN Act 2007 and BOFIA 2020. Section 2 of the CBN Act sets out the Bank's objects, including the promotion of a sound financial system in Nigeria.[7] Specifically, section 47(1)–(2) of the CBN Act provides that:

“(1) The Bank shall facilitate the clearing of cheques and credit instruments for banks carrying on business in Nigeria and for this purpose, the Bank shall at any appropriate time establish clearing houses in premises provided by the Bank in such places as the Bank may consider necessary;

Provided that a Bank may be barred from participating in clearing for such Period as the Bank may deem fit for non-compliance with directives of the Bank.

(2) Notwithstanding sub-section (1) of this section and in furtherance of the Provisions of section 2(d) of this Act, the Bank shall continue to promote and facilitate the development of efficient and effective systems for the settlement of transactions (including the development of electronic payment systems).”

These provisions give the CBN express statutory authority to establish and operate clearing and settlement systems and to promote efficient electronic payment arrangements, thereby providing the statutory basis for its oversight of payment systems. Sections 57–58 of BOFIA complement this by prohibiting the conduct of other financial business without a CBN licence, expressly extending to digital and virtual financial services.[8] The CBN's regulatory mandate encompasses issuing payment service provider licences, approving payment guidelines, and operating regulatory sandboxes to facilitate innovation.[9]

[6] ‘NIBSS, Nigeria’s e-Payment Transactions Hit 5-Yr High: surged to 5.2 billion in 2022’ (News, Insights page, Nigerian Inter-Bank Settlement System, 2023) < Nigeria’s e-Payment Transactions Hit 5-yr High …surged to 5.2 billion in 2022 - NIBSS> accessed 21st July, 2025
7] Section 2 of the CBN Act, 2007
[8] Section 57 Banks and Other Financial Institutions Act 2020
[9] Central Bank of Nigeria, ‘Framework for Regulatory Sandbox Operations’ 2021 <https://www.cbn.gov.ng/out/2021/ccd/framework%20for%20regulatory%20sandbox%20operations.pdf> accessed 21st July, 2025

2.2 Complementary Regulatory Authorities

Nigeria's payment system regulation involves multiple specialised agencies providing complementary oversight functions. The Securities and Exchange Commission (SEC), operating under the Investment and Securities Act 2025, regulates investment-based fintechs and oversees crowdfunding platforms.[10] The SEC's dual licensing arrangement with the CBN addresses fintech operations that intersect capital market activities.[11]

The National Data Protection Commission (NDPC), established under the Nigeria Data Protection Act 2023, governs personal data processing within the payment ecosystem.[12] This regulatory framework mandates lawful consent for data collection and implements security requirements aligned with global standards. The NDPC's establishment represents a significant advancement from the previous Nigerian Data Protection Regulation administered by the National Information Technology Development Agency (NITDA).

NITDA is an important policy and standards body for Information Technology (IT), including cybersecurity guidance and IT governance frameworks,[13] while the NDPC remains the principal data-protection supervisor. The Nigerian Communications Commission (NCC) regulates telecommunications infrastructure underpinning fintech operations, including USSD services and SMS-based payment platforms.[14]

The Nigeria Deposit Insurance Corporation (NDIC) is established under the Nigeria Deposit Insurance Corporation Act, 2023. It regulates deposit insurance and guarantees liabilities of all licensed financial institutions in the event of failure and seeks to promote confidence in the financial services sector. The Nigeria Deposit Insurance Corporation (NDIC) provides deposit insurance for licensed deposit-taking institutions, including Deposit Money Banks (DMBs), Payment Service Banks

(PSBs) and Microfinance Banks (MFBs), and offers pass-through insurance for Mobile Money Operator (MMO) subscribers where applicable.[15] Non-deposit payment service providers (for example, PSSPs and PTSPs) are generally not NDIC-insured institutions; coverage depends on license type. The NDIC also established the Fintech Innovations Unit, to meet up with the demands of technological innovations and their significance in the financial services sector.[16]

[10] Section 1 Investment and Securities Act 2025
[11] SEC Nigeria, 'SEC Regulatory Incubation Guidelines for Specific Category of Fintech Entrepreneurs' <https://sec.gov.ng/regulatory-incubation-program/ > accessed 21st July 2025
[12] Section 5 Nigeria Data Protection Act 2023
[13] Section 3 National Information Technology Development Agency Act 2007
[14] Section 4 Nigerian Communications Commission Act 2003
[15] NDIC Increases Maximum Deposit Insurance Coverage for Bank Depositors', May 2024 < ndic increases maximum deposit insurance coverage for bank depositors – ndic > accessed 15th September, 2025
[16] Esher & Makarios 'Fintech: Legal and Regulatory Considerations' <https://esherandmakarioslaw.com/assets/resources/d66eab5b9598f016af0ce2ba5b131eb1.pdf> accessed 15th August, 2025

3.0 PAYMENT SERVICE LICENSING FRAMEWORK

3.1 Licence Categorisation

The Central Bank of Nigeria (CBN) has implemented a comprehensive licensing system for Payment Service Providers (PSPs) under the Banks and Other Financial Institutions Act 2020 (BOFIA) and the CBN Guidelines on Operations of Electronic Payment Channels (2021). This framework establishes Nigeria as Africa's fintech leader while maintaining financial stability, with severe penalties including ₦500 million fines, license revocation, and potential prosecution. Section 57-58 of BOFIA 2020 make unauthorised financial business an offence and provide for sanctions against entities that carry on financial business without the required licence.

The CBN also issues enforcement circulars and public statements setting out administrative penalties and remedial measures for non-compliant operators. The CBN issues three main license types: Payment Service Provider (PSP) Licenses requiring ₦100 million capital under the CBN's circular of 9th December 2020 and the Consolidated Licensing Circular of 24 May 2021; Mobile Money Operator (MMO) licenses with ₦2 billion capital requirements as specified in CBN Circular PSM/CIR/GEN/03/2023 under the MMO Framework (2021); and Payment Service Banks (PSBs) governed by the CBN Guidelines for PSBs (2020) that can accept limited deposits. The CBN Regulatory Sandbox Framework (2021) allows up to 6-month testing periods (with extensions). Some participants later apply for full licences, though public data on the conversion rate is limited. Additional regulatory requirements include the National Data Protection Commission's (NDPC) annual audits under the Nigeria Data Protection Act 2023, NCC USSD Determination (2018, updated 2020), and Securities and Exchange Commission rules under the Investment and Securities Act 2025. In Kenya, PSPs are regulated under the National Payment System Act 2011 and the National Payment System Regulations 2014, which provide for multiple classes of PSP licences. In South Africa the National Payment System Act 1998 remains the primary statute and the country operates a "Twin Peaks" model with oversight split between the South African Reserve Bank and the Financial Sector Conduct Authority.[17] Under this framework, only Mobile Money Operators are permitted to hold customer funds, while entities in other categories are prohibited from such activities.[18] The switching and

[1] Section 3 of South Africa National Payment System Act, 1998.
[2] S. Ekanem, 'Nigeria's Central Bank Slams Paystack with Record Fine Over Fintech Compliance' Business Insider Africa, 2025 <https://africa.businessinsider.com/local/markets/nigerias-central-bank-slams-paystack-with-record-fine-over-fintech-compliance/j4rttrj> accessed 21st July, 2025

processing licence permits transaction routing between financial institutions but does not authorise fund custody, a distinction that proved crucial in recent enforcement actions.[19]

3.2 Capital Requirements and Operational Restrictions

The licensing framework establishes varying capital requirements across categories, with Switching and Processing and Mobile Money Operator licences requiring ₦2,000,000,000 (Two Billion Naira) shareholders' funds unimpaired by losses.[20] Payment Solution Services licence requires ₦250,000,000 (Two Hundred and Fifty Million Naira) shareholders' funds unimpaired by losses. Payment Terminal Service Provider and Payment Solution Service Provider licences require ₦100,000,000 (One Hundred Million Naira) shareholders' funds unimpaired by losses each. Super-Agent Licence requires ₦50,000,000 (Fifty Million Naira) shareholders' funds unimpaired by losses.

4.0 CONTEMPORARY REGULATORY CHALLENGES: THE PAYSTACK'S ZAP CASE STUDY

4.1 Case Overview

Paystack launched "Zap" in March 2025 as a consumer-facing peer-to-peer transfer service. In April–May 2025 multiple outlets reported that the CBN had taken enforcement action, including a reported administrative sanction of ₦250 million and suspension of the Zap product. The regulator's concerns related to the product's wallet-like features and the scope of Paystack's Payment System Solution Providers (PSSP) commercial licence.[21]

4.2 Regulatory Violation Analysis Zap: Paystack's New Innovation and its Regulatory Violation

The Central Bank of Nigeria (CBN) imposed a ₦250 million fine on Paystack in April-May 2025 for operating beyond the limits of its regulatory license through its Zap peer-to-peer transfer service. Paystack holds a PSSP license, which permits it to route financial transactions between banks and other institutions and cannot hold customer funds, a privilege limited to banks or fintechs with the MMO license.[22]

Paystack launched Zap as a consumer-facing product designed for fast, secure peer-to-peer money transfers. However, CBN determined that Zap functioned as a digital wallet deposit-taking product, which requires a microfinance or banking license to operate legally in Nigeria.[23]

While Paystack argued that Titan Trust Bank held user funds in compliance, the CBN ruled Paystack's operational control over Zap's interface violated its license terms and breached prior approval requirements for fintech-bank partnerships (CBN Circular

[19] Central Bank of Nigeria, 'Regulatory Framework for Non-Bank Acquiring in Nigeria', February 2021 < regulatory framework for non-bank acquiring in Nigeria 2021.pdf > accessed 21st of August, 2025

[20]Central Bank of Nigeria, 'Approved New Licence Categorization Requirements' 2021 <https://www.cbn.gov.ng/out/2021/ccd/approved%20new%20licence%20categorization%20requirements%20consolidated%20-%202021.pdf> accessed 21st of July, 2025

[21] B. Omotayo, ' CBN fines Paystack ₦250m fine over Zap wallet operations' Business Insider Africa, 2025 < https://business.insider.ng/technology/article/cbn-fines-paystack-%E2%82%A6250m-fine-over-zap-wallet-operations/> accessed 21st July, 2025

[22] Paystack, "Compliance at Paystack", < Compliance at Paystack > accessed 18th October, 2025

[23] TechCabal, "CBN fines Paystack N250 Million over Zap Operations, citing licencing breach", April 30, 2025 < CBN fines Paystack ₦250 Million over Zap operations > accessed 18th October, 2025

PSM/CIR/GEN/CIR/01/22).[24] In Nigeria's tightly regulated financial services space, a wallet typically refers to a digital account that stores customer funds, allows payments, transfers, and often provides financial management tools.Operating a wallet without the right license raises red flags with the CBN, which has grown increasingly vigilant about regulating the boundaries between licensed activities.

This enforcement reflects the CBN's heightened scrutiny of fintech compliance, particularly regarding wallet-like services that blur lines between payment processing (PSSP-permitted) and fund custody (MMO/bank-exclusive). The case establishes critical precedents: (1) product design determines regulatory classification regardless of technical partnerships; (2) bank collaborations require pre-approval; and (3) innovative features must undergo Regulatory Sandbox review.

4.3 Legal Defenses and CBN's Response

According to CBN's circular, (PSM/CIR/GEN/CIR/01/22) dated 9th December 2020, "collaborations between licensed payment companies and other financial institutions in respect of product and services are subject to CBN's prior approval." The direct implication of the above rule is that all classes of fintech companies in Nigeria with payment service licenses are required to seek and obtain CBN's license first before partnering on any products or services offered by either party.

Paystack invoked agency doctrine, arguing Titan Trust Bank (TTB) served as the principal custodian, with Paystack acting only as a processor. The CBN rejected this defense, noting that Paystack's control over Zap's user interface, marketing claims of instant wallets, and lack of pre-approved agency terms demonstrated de facto custody. The Paystack case raises questions about the legality of indirect fund custody via regulated bank partnerships. Section 57 of BOFIA 2020 prohibits financial operations without explicit licensing, yet does not preclude bank-fintech collaboration, creating a gray area exploited by Zap.

The case highlights broader challenges in Nigeria's fintech regulation, where rapid technological innovation frequently surpasses the pace of regulatory response. It reveals that regulatory classification is driven by product design rather than technical partnerships, that collaborations with banks require prior approval. Furthermore, the CBN's lack of prior sandbox review suggests either non-engagement by Paystack or systemic inefficiencies in sandbox awareness or capacity. NIBSS has continued to report strong year-on-year growth in e-payment transaction volumes and values into 2025.[25] However, participation in the regulatory sandbox has been relatively low and conversion of sandbox-tested products to full licences has been limited, indicating the sandbox remains an under-utilised tool for de-risking launches.

[24] ibid

[25] NIBSS, 'Nigeria's e-Payment Transactions Hit 5-Yr High: Surged to 5.2 Billion in 2022 (News/Insights page, Nigerian Inter-Bank Settlement System)', 2023 < https://nibss-plc.com.ng/nigerias-e-payment-transactions-hit-5-yr-high-surged-to-5-2-billion-in-2022/ > accessed 15th August, 2025.

5.0 CONSUMER PROTECTION IMPLICATIONS

Consumers remain the most vulnerable stakeholders when regulatory breaches occur. Under the Nigeria Data Protection Act (NDPA) 2023, payment operators must secure lawful consent, protect personal data, and implement robust breach notification protocols. The CBN also mandates that MMOs and PSSPs maintain insurance or trust accounts to protect customer funds. However, when fintechs operate outside licensing boundaries, users may face delayed settlements, frozen accounts, or data exposure.

There are serious legal implications for customers if a PSSP begins to hold funds. For instance, if a PSSP opens a pooled account in its own name with a deposit money bank to provide wallet functionality, and the PSSP later becomes insolvent, those customer funds might be treated as corporate assets in liquidation, even if contractually they belong to users.

Also, PSSPs are not expressly required to structure customer funds with nominee protections or insolvency safeguards. This puts customer deposits at higher risk of loss in the event of a PSSP failure.[26]

6.0 COMPARATIVE ANALYSIS: KENYA AND SOUTH AFRICA

Comparative analysis reveals significant variations in payment system regulation across African jurisdictions. Kenya's payment system operates under the Central Bank of Kenya E-Money Guidelines (2013) and has long implemented interoperability and trust-account safeguards. It's Regulatory Sandbox (since 2019 with the Capital Markets Authority and the Central Bank of Kenya) and multi-sector coordination support fintech entry.[27] Regulatory innovation is flexible and demand-driven, which has facilitated rapid adoption of solutions like M-Pesa.[28]

In South Africa, governance is conducted through a “Twin-Peaks” system; with oversight split between the South African Reserve Bank and the Financial Sector Conduct Authority, which oversees sandboxes (2020, reviewed in 2022).[29] The system emphasises public–private collaboration and consumer protection, though critics call for increased sandbox deployment to match fintech growth.[30]

Nigeria’s capital requirements remain higher than peer markets, with ₦2 billion for switching licenses versus Kenya’s ₦450 million equivalent. Licensing timelines average 6-8

[26] Balogun Harold, ‘Paystack and the holding funds rule: Implications for a PSSP’ May 20, 2025 <https://balogunharold.com/ > accessed 15th August 2025

[27] Payop ‘Simple guide to payment regulations in Africa’ 2025 < https://payop.com/business/simple-guide-to-payment-regulations-in-africa/ > accessed 21st July, 2025

[28] ibid

[39] Afriwise ‘How Africa’s Big 4 are leading the way in FinTech regulations’ 2023 <https://www.afriwise.com/blog/how-africas-big-4-are-leading-the-way-in-fintech-regulations> accessed 21st July, 2025

[30] ibid

months, significantly longer than Kenya's 90-day benchmark. Unlike Kenya, where fintechs operate under multiple classes of PSP licences, Nigeria's heavy capital thresholds create high barriers for startups. South Africa provides structured stability through its Twin-Peaks and consultative sandbox approach. While Nigeria leads in licensing sophistication and open banking, [31] its conservative stance may hinder fintech agility.

7.0 CHALLENGES OF REGULATION IN NIGERIA'S PAYMENT INDUSTRY

7.1 Regulatory Fragmentation

FinTechs in Nigeria are regulated by multiplicity of agencies. Nigeria's multi-agency regulatory approach, while comprehensive, creates coordination challenges and potential regulatory arbitrage.[32] The absence of a unified fintech regulation framework necessitates navigation of multiple regulatory requirements, increasing compliance costs and operational complexity.[33]

7.2 Innovation-Regulation Gap

The rapid pace of fintech innovation frequently outpaces regulatory adaptation, creating uncertainty for market participants.[34] This gap is particularly pronounced in emerging areas such as cryptocurrency, open banking, and artificial intelligence applications in financial services.[35]

7.3 Infrastructural Limitations

Despite regulatory advances, infrastructural constraints continue to Infrastructural Limitations

Despite regulatory advances, infrastructural constraints continue to limit payment system efficiency. Inadequate telecommunications infrastructure, cybersecurity vulnerabilities, and limited financial inclusion present ongoing challenges.Infrastructure limitations persist as users experience transaction delays, system failures, and high costs despite improvements through platforms like NIBSS Instant Payment (NIP), while NIBSS's 2023 Annual Fraud Landscape reported aggregate fraud losses of approximately ₦13.6 billion in 2023 (about a 41% year-on-year increase), underscoring persistent fraud risks in the payments ecosystem.

7.4 Regulatory Risks for Emerging Fintech Models

As fintech models become increasingly complex, e.g., embedded finance, API banking, AI-driven investment bots; the current classification into MMO, PSSP, or Super Agent may prove outdated. There's an urgent need for dynamic licence reclassification frameworks, adaptive compliance benchmarks, and regulatory sandboxes tailored by business model risk, not just service type.

[31]Central Bank of Nigeria, "Operational Guidelines for Open Banking in Nigeria,' March 2023 < Operational Guidelines for Open Banking in Nigeria.pdf > accessed 21st August 2025.
[32] C. G. Eneh, 'Regulatory challenges in Fintech: Breaking down the red tape' Business Day 2024 <https://businessday.ng/> accessed 21st July 2025
[33] J. O. Ogwu 'A Critical Appraisal of Fintech Regulation In Nigeria' SSRN 2022 <https://papers.ssrn.com/sol3/Delivery.cfm/4914808.pdf?abstractid=4914808&mirid=1&type=2> accessed 21st July, 2025
[34] ibid
[35] O. Nwanchukwu, 'CBN says unregulated financial service platforms challenging system oversight' Business Day, 2017 <https://businessday.ng/exclusives/article/cbn-says-unregulated-financial-service-platforms-challenging-system-oversight/> accessed 21st July, 2025

8.0 CONCLUSION AND RECOMMENDATIONS

Nigeria's payment system regulatory framework reflects a high degree of sophistication and comprehensiveness, establishing the country as a regional leader in fintech regulation. However, key challenges persist, including regulatory fragmentation, protracted licensing procedures, and infrastructural constraints that continue to hinder optimal performance of the payment ecosystem. The Paystack's Zap case illustrates the pressing need for clearer regulatory guidance and frameworks that are agile enough to accommodate innovation while ensuring systemic stability.

To address these challenges, the following measures are recommended:

1.Regulatory Harmonisation: Establishment of an inter-agency coordination mechanism to ensure consistent policy implementation across regulatory bodies. This should include regular stakeholder consultation forums and harmonised reporting requirements to reduce the compliance burden on market participants.

2. Adaptive Regulatory Framework: Adoption of a principles-based regulatory model, supplemented by detailed guidance, to bridge the gap between innovation and regulation. The existing CBN Regulatory Sandbox should be expanded to accommodate a broader range of emerging technologies while maintaining robust consumer protection standards.

3.Infrastructure Development: A coordinated national investment strategy should be pursued to strengthen digital infrastructure, particularly in enhancing cybersecurity measures and ensuring reliable telecommunications networks necessary for real-time payments.

Future regulatory evolution must centre on improving inter-agency coordination, simplifying licensing regimes, and ensuring regulatory adaptability in response to rapid technological advancement. Successfully implementing these reforms will be essential to sustaining Nigeria's leadership in Africa's digital payments ecosystem.