

Stablecoins in the trade between Africa and China

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In the trade between Africa and China, payment in stablecoins is already common practice. African importers who cannot obtain enough US dollars from their banks pay in tokens, and Chinese exporters accept them. This practice runs largely without a legal framework, which creates risks for everyone involved and makes careful structuring necessary.

1 The starting point

According to published industry analyses, about 43 per cent of crypto transaction volume in sub-Saharan Africa is in stablecoins, and stablecoin transactions of around USD 22 billion were reported for Nigeria in 2025. The driver is the shortage of foreign currency: importers do not receive sufficient dollar allocations from their banks and turn to tokens instead. Chinese exporters accept these payments, especially in the trade through Guangzhou and Yiwu.

2 Mainland China

In February 2026 the People's Republic of China expressly extended its ban on crypto business to stablecoins and to the tokenisation of real-world assets, and formalised the prohibition of yuan-denominated stablecoins. A Chinese exporter that accepts tokens on the mainland is therefore acting outside the permitted framework.

3 Hong Kong

Hong Kong has operated a licensing regime for stablecoin issuers under the Stablecoins Ordinance since 1 August 2025. On 24 March 2026 the Hong Kong Monetary Authority granted the first two licences, to HSBC and to Anchorpoint Financial, a joint venture led by Standard Chartered. Of about thirty-six applicants, only these two were licensed at first, which shows

how narrowly the regime is applied. The first regulated Hong Kong dollar stablecoin came to market in August 2026.

4 Singapore

On 30 June 2025 Singapore introduced its licensing regime for digital token service providers, which also covers companies that serve only foreign customers from Singapore. The stablecoin framework announced in 2023 is being implemented through an amendment of the Payment Services Act, which was consulted on in 2026. It provides for full reserve backing and a prohibition on paying interest.

5 Switzerland

In Switzerland, FINMA's guidance of 2024 applies, under which the issuance of stablecoins is generally to be treated as the acceptance of deposits from the public. The Federal Council has put a revision of the Financial Institutions Act out to consultation, which is to cover stablecoins and crypto service providers; at the time of writing, its dispatch to Parliament had not yet been adopted. For the tokenisation of rights, the ledger-based securities under Articles 973d et seq. of the Code of Obligations are available.

6 The European Union and the United States

In the European Union the stablecoin rules of MiCA have applied since 30 June 2024, and the transitional period ended on 1 July 2026. In the United States, the GENIUS Act of July 2025 created the federal framework. Its implementing rules were published in draft in August 2026, including a pathway for foreign issuers.

7 Four structures that work

The gap between the prohibition on the Chinese mainland, the licensing regime in Hong Kong and the actual use in Africa is where advice is needed. Four structures are workable.

- Settlement through a licensed institution in Hong Kong or Europe instead of a bilateral token exchange, with the token serving only the last mile into the African market.
- A Swiss treasury vehicle that receives and pays out tokens through regulated counterparties, documents the conversion and carries out the anti-money laundering review of the source of funds.

- Tokenisation of the commodity position or the trade receivable as ledger-based securities under Articles 973d et seq. of the Code of Obligations, as an instrument for security and financing, combined with electronic trade documents under the English Electronic Trade Documents Act 2023.
- Express rules on token payments in the supply contract itself: the permitted tokens, the reference exchange rate, the moment at which payment discharges the debt, who bears the exchange rate risk between payment and conversion, and the consequences if a wallet address is blocked.

8 Anti-money laundering from 1 October 2026

From 1 October 2026, advice on such structures is itself subject to the revised Anti-Money Laundering Act where it concerns the formation or administration of companies. The review of the source of funds for token payments is then the central duty. The article on [the transparency register and the revised Anti-Money Laundering Act](#) explains the new rules.

9 Why Zug

Zug is the natural seat for such structures. About 715 companies in the field of crypto and digital assets are based there, the tax administration is familiar with the subject, and the canton has accepted tax payments in Bitcoin since 2021. The article on [crypto and digital assets in Switzerland](#) gives an overview of the Swiss framework.

10 How Ressos Legal helps

I review and structure payment flows involving stablecoins and tokenised commodity positions, draft the payment clauses of supply contracts, and advise on the regulatory position in Switzerland, Hong Kong and Singapore. I have advised on crypto and digital assets since 2017. [Contact me](#) for a first conversation.

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Online version: helveticaregister.com/stablecoins-africa-china-trade