Addis
Tax Initiative

2023 ATI Monitoring Report

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Imprint

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The Addis Tax Initiative (ATI) is a multi-stakeholder partnership consisting of partner countries, development partners, and supporting organisations. It fosters collective action to improve tax systems in light of recognised gaps in development finance and aims to promote fair and effective domestic revenue mobilisation (DRM), policy coherence, and the social contract through partnerships and knowledge building.

The ITC provides secretarial services for the ATI.

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Foreword

We are pleased to present the 2023 Addis Tax Initiative (ATI) Monitoring Report. This report sheds light on the progress made and challenges encountered by partner countries, development partners, and supporting organisations in strengthening domestic revenue mobilisation (DRM). Covering the period from 2021 to 2023, it offers a comprehensive picture of advancements towards the four core commitments outlined in the ATI Declaration 2025.

The findings presented here provide valuable insights into the progress made by ATI partner countries, as well as the challenges encountered in achieving their goals, particularly in the context of ongoing global challenges. Amid the recovery from the COVID-19 epidemic, continued supply chain disruptions, and mounting geopolitical tensions, many partner countries made notable strides. The average revenue-to-GDP ratio among ATI partner countries rose from 16.9% in 2020 to 17.7% in 2021 – a promising signal of strengthened tax systems. Although the complete data for 2022-23 is not yet available, early indications point toward continued resilience in DRM efforts.

ATI development partners, meanwhile, maintained their commitment to supporting DRM, providing Official Development Assistance (ODA) at approximately 75% of the target value in both 2021 and 2022. However, in 2023, ODA for DRM declined to USD 281.14 million - a 20.3% decrease from 2020 – reflecting the impact of shrinking fiscal space and tighter ODA budgets. These developments underscore the growing urgency of effective DRM cooperation in a constrained global financing environment. Against this backdrop, we are also encouraged by progress made by ATI members in the realm of policy coherence, adoption of international tax standards, and efforts to improve transparency and effectiveness of tax expenditures – while recognising that significant work remains. Encouragingly, the report also notes cautious but important improvements in transparency and accountability of tax systems.

We extend our sincere thanks to all ATI partner countries, development partners, and supporting organisations for their continued dedication to materialising the ATI mission of promoting fair and effective domestic revenue mobilisation, policy coherence, and the social contract through partnerships and knowledge building. On behalf of the Steering Committee, we would like to also thank the ATI Secretariat for their tireless efforts in support countries in achieving the aspirations of the ATI Declaration 2025. Together, we can build tax systems that deliver for people and help achieve the Sustainable Development Goals.

Sincerely,

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Glossary

AEoI	Automatic Exchange of Information
ATI	Addis Tax Initiative
ATAF	African Tax Administration Forum
BEPS	Base Erosion and Profit Shifting
BMZ	Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung (German Federal Ministry for Economic Cooperation and Development)
CbC MCAA	Country-by-Country Multilateral Competent Authority Agreement
CbCR	Country-by-Country Reporting
CIAT	Inter-American Center of Tax Administrations
CIT	Corporate income tax
CRI	Commitment to Reducing Inequality Index
CRS	Common Reporting Standard
CSO	Civil society organisation
DAC	Development Assistance Committee
DFI	Development Finance International
DRM	Domestic revenue mobilisation
DTA	Double taxation agreement
EC	European Commission
EoIR	Exchange of Information on Request
EU	European Union
FfD	Financing for Development
FfD3	Third International Conference on Financing for Development
FfD4	Fourth Financing for Development Conference
GDP	Gross Domestic Product
GFG	Good Financial Governance
GFI	Global Financial Integrity
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German development cooperation agency)
GRD	Government Revenue Dataset
GRD	Government Revenue Dataset

GTED	Global Tax Expenditures Database
GTETI	Global Tax Expenditures Transparency Index
IBP	International Budget Partnership
ICTD	International Centre for Tax and Development
IFFs	Illicit financial flows
IMF	International Monetary Fund
ISORA	International Survey on Revenue Administration
ITC	International Tax Compact
KFSI	Key Financial Secrecy Indicator
LDCs	Least developed countries
MAP	Mutual Agreement Procedure
MCAA	Multilateral Competent Authority Agreement
MLI	Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting
NGO	Non-governmental organisation
OBS	Open Budget Survey
ODA	Official development assistance
OECD	Organisation for Economic Cooperation and Development
PIT	Personal income tax
SDGs	Sustainable Development Goals
TA	Technical assistance
TIWB	Tax Inspectors without Borders
TJN	Tax Justice Network
TP	Transfer pricing
UK	United Kingdom
UN	United Nations
UNDP	United Nations Development Programme
UNU-WIDER	United Nations University World Institute for Development Economics Research
US	United States of America
VAT	Value-added tax
WATAF	West African Tax Administration Forum

Executive Summary

The Addis Tax Initiative (ATI) is a multi-stakeholder partnership comprising 77 partner countries, development partners, and supporting organisations. Its mission is to promote fair and effective domestic revenue mobilisation (DRM), strengthen policy coherence, and enhance partnerships and knowledge building, focusing on partner country needs.

Launched at the Third International Conference on Financing for Development (FfD) in Addis Ababa, Ethiopia, in July 2015, the ATI initially focused on the ATI Declaration 2020, which outlined three core commitments to support DRM through 2020. In November 2020, ATI members reaffirmed their commitment by adopting the ATI Declaration 2025, which introduces four core commitments to advance DRM efforts. Since its inception, the ATI has seen significant growth in membership. It now includes 33 partner countries from across Africa, Asia, South America, and the Pacific; 20 development partners; and 24 supporting organisations, including international institutions, private foundations, and research bodies.

ATI Commitment 1
ATI partner countries commit to enhance DRM on the basis of equitable tax policies as well as efficient, effective and transparent revenue administrations. ATI development partners commit to support such reforms.

ATI Commitment 2
ATI development partners collectively commit to maintain or surpass the 2020 global target level (USD 441.1 million) of DRM cooperation for country-owned tax reforms.

ATI Commitment 3
ATI members commit to apply coherent and coordinated policies that foster DRM and combat tax-related illicit financial flows (IFFs).

ATI Commitment 4
ATI members commit to enhance space and capacity for accountability stakeholders in partner countries to engage in tax and revenue matters.

ATI Commitment 1: *ATI partner countries commit to enhance DRM on the basis of equitable tax policies as well as efficient, effective and transparent revenue administrations. ATI development partners commit to support such reforms.*

The average revenue-to GDP ratio for ATI partner countries was 17.7% in 2021 and 16.15% in 2022, compared to 16.9% in 2020. Tax revenues comprised 84.2% of total revenue in 2021 and 84.8% in 2022, compared to 84.4% in 2020. The largest source of tax revenue in 2021 were taxes on goods and services (44.8%), while in 2022 taxes on income, profit and capital gains were the most significant source (41%)1.

Progress is also evident in the adoption of targeted tax policies. Seven ATI partner countries reported implementing tax measures to promote gender equality by 2023, compared to two in 2020. 12 partner countries adopted tax measures to support environmental sustainability by 2023, doubling from six in 2020.

By 2022, 29 ATI partner countries had Large Taxpayer Offices, with a further eight having set up units engaging High Net Worth Individuals.

Trends in timeliness of tax filings and payments between 2020 and 2022 show mixed progress across key tax types. Outliers contributed to significant fluctuations in aggregate performance metrics and may reflect prolonged recovery from the COVID-19 pandemic and temporary tax relief measures, as well as variation in data sources used to compile payment and filing statistics.

Out of 16 ATI partner countries responding to tax gap-related survey questions, 11 reported having recently conducted tax gap analyses (up from eight in 2020), with many focusing on VAT. In 2022, the closing stock of arrears across ATI partner countries averaged 52.4% of total tax revenue, ranging widely from 0.7% to 514.3%. Large variations in closing stock of arrears may be due to the economic shocks of COVID-19 lockdowns in 2020 and 2021, where levels of non-compliance increased, and revenue potential decreased. While economic conditions gradually began to improve by 2022, progress has been slow to return to pre-COVID levels.

In 2023, 35.7% of Official Development Assistance (ODA) for DRM provided by ATI development partners included aims to promote equity outcomes and 32.3% supported efforts to enhance the efficiency, effectiveness, and transparency of tax administrations.

ATI Commitment 2: *ATI development partners collectively commit to maintain or surpass the 2020 global target level (USD 441.1 million) of DRM cooperation for country-owned tax reforms.*

In 2023, gross ODA for DRM disbursed totalled USD 281.1 million, marking a 20.3% decrease compared to 2020. Despite this decline, ODA for DRM has increased by 27.4% since 2015. However, ATI development partners remain USD 160 million short of their collective 2025 target. In 2022 and 2021, development partners disbursed USD 345.12 million and 349.73 million, respectively. Notably, 13 out of 20 development partners have more than doubled their ODA for DRM at least for one year between 2021 and 2023.

ODA for DRM in 2023 reached at least 98 countries, with ATI partner countries Tanzania, Ghana, and Indonesia among the top ten recipients. Of the 33 ATI partner countries, 18 received increased ODA for DRM compared to 2022. The Sub-Saharan Africa region was the largest regional recipient, accounting for 21% of total disbursements. An increasing share of ODA is being

[1] 2023 data is not yet available.

directed to unspecified developing countries. In terms of income classification, 43.2% of ODA disbursements in 2023 were unallocated by income group. Least Developed Countries (LDCs) were the second-largest group, receiving 24.6%, down from 35% in 2020.

Project-type interventions continue to be the dominant form of DRM support, comprising nearly 60% of total disbursements. 13 ATI development partners identified specific ways they are promoting a country-owned approach to their DRM-related ODA.

ATI Commitment 3: *ATI members commit to apply coherent and coordinated policies that foster DRM and combat tax-related illicit financial flows (IFFs).*

The 2023 peer review on harmful tax practices issued recommendations for one ATI development partner. Of the 19 ATI government development partners[2], 18 are signatories to both the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI) and the Country-by-Country Multilateral Competent Authority Agreement (CbC MCAA).

Notable progress was observed in 2023, as the number of compliant tax agreements under BEPS Action 6 increased significantly, from 373 in 2020 to 746 in 2023. There were 116 active bilateral exchange relationships under the CbC MCAA between ATI development partners and partner countries, up from 35 in 2020. The number of ATI development partners with activated bilateral exchange relationships increased from just two in 2020 to seven in 2023.

In 2021, four development partners underwent Stage 2 peer reviews under BEPS Action 14 regarding their Mutual Agreement Procedure (MAP) provisions. Although no additional peer reviews occurred in 2022 or 2023, many development partners continue working toward full compliance with Action 14.

As of 2023, only Denmark, the Netherlands, and Ireland had conducted spillover analyses to assess the impacts of their tax policies on the ability of other countries to raise domestic revenue.

Among ATI partner countries, 26 have published tax expenditure data, with 17 doing so regularly, compared to 13 regularly reporting out of 21 partner countries with published tax expenditure data in 2020. Despite this progress, about half still do not include tax expenditure information in their supporting budget documentation for the fiscal year.

In terms of tackling illicit financial flows (IFFs), 18 of the 19 ATI government development partners (excluding the United States) are signatories to, and have begun implementing:

the Common Reporting Standard (CRS) Multilateral Competent Authority Agreement (MCAA) for Automatic Exchange of Information (AEoI); and

the Amended Multilateral Convention on Mutual Administrative Assistance in Tax Matters for Exchange of Information on Request (EoIR).

By 2023, 11 ATI partner countries had also become signatories to the CRS MCAA.

Efforts to strengthen legal frameworks for identifying and registering beneficial owners show mixed results. However, where data is available for partner countries, there is a discernible reduction in financial secrecy.

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[2] This excludes the EU, as individual countries are signatories.

ATI Commitment 4: *ATI members commit to enhance space and capacity for accountability stakeholders in partner countries to engage in tax and revenue matters.*

In 2023, 22 ATI partner countries published tax or revenue strategies, doubling the number reported in the 2020 Monitoring Report. Additionally, 27 partner countries publicly reported revenue raised by individual tax types, while eight reported tax revenues by economic sector.

Across ATI partner countries, 63% published disaggregated tax revenue data and included multi-year revenue estimates by category in their national budget processes. On tax expenditure transparency, 12 countries published some relevant information. However, many reports lacked key elements, such as the policy rationale, a list of intended beneficiaries, and estimates of foregone revenue.

Data on revenue foregone concerning taxes on goods and services, income, and property was available for 23 ATI partner countries. However, reporting on property tax expenditures remains both limited and relatively low compared to other tax types.

In terms of public engagement, analysis from the Open Budget Survey (OBS) suggests modest progress since the 2021 OBS. Public engagement on tax matters remains limited, particularly during budget formulation, implementation, and legislative phases. Challenges also persist regarding advance provision of information to citizens and the effective use of public feedback mechanisms.

In 2023, 17% of total ODA for DRM aimed to promote accountability, transparency, and the involvement of non-state actors in tax policy. However, only 4.5% of total ODA for DRM was directly channelled to civil society organisations as primary implementing partners.

Introduction

The Addis Tax Initiative (ATI) Monitoring Report covers the period 2021 to 2023, marking the second assessment cycle under the ATI Declaration 2025, building on the baseline established in the 2020 Monitoring Report.

The ATI was launched at the Third International Conference on Financing for Development (FfD) in Addis Ababa, Ethiopia, in 2015. At this landmark event, the founding members adopted the ATI Declaration 2020, centred around three core commitments to support domestic revenue mobilisation (DRM) through to 2020. These commitments focused on:

1. Development partners increasing their support for DRM,
2. Partner countries strengthening their own DRM efforts, and
3. All members enhancing policy coherence for development in support of DRM.

These commitments guided the collective efforts of a growing ATI membership, fostering collaboration and mutual accountability in advancing DRM. In 2020, members launched the ATI Declaration 2025, which introduced four renewed commitments. These reflect a deeper focus on shared responsibility and mutual accountability between development partners and partner countries to achieve effective, inclusive, and transparent DRM outcomes.

DRM plays a central role in strengthening governance, accountability, and the social contract between governments and citizens. As countries strive to recover from multiple crises and progress towards the Sustainable Development Goals (SDGs), effective DRM is essential to ensuring both debt sustainability and equitable public investment.

In the current global context characterised by rising debt burdens, fiscal constraints, and declining levels of Official Development Assistance (ODA), DRM has emerged as a critical pillar of sustainable development financing. It provides countries with a more predictable, resilient, and autonomous source of funding to meet national development goals, reduce external dependency, and ensure long-term fiscal sustainability.

Recently announced reductions in ODA by several major donor countries, driven by shifting geopolitical priorities and fiscal pressures in donor countries, have begun to disrupt critical development programmes, underscoring the vulnerability of external financing sources. ODA cuts are unfolding against a backdrop of rising debt burdens, shrinking fiscal space, and increased financial volatility for emerging market and developing economies. As aid flows become more volatile and unpredictable, and as external shocks (e.g., global trade tensions, pandemics, and conflict) continue to strain budgets, the need for sustainable, resilient, and country-owned sources of revenue is more pressing than ever. Strengthening DRM is a fiscal necessity and strategic imperative. As highlighted in the ATI, effective DRM underpins progress on the SDGs and is fundamental to inclusive, equitable, and accountable public investment.

At the time of this writing in June 2025, the Fourth Financing for Development Conference (FfD4) in Seville, Spain, is only a few weeks away. The conference marks the closure of one year of intensive discussions and negotiations between countries and organisations to set new global priorities for financing for development. FfD4 does not only coincide with the 10th anniversary of the ATI but also with the final year of the implementation of the ATI Declaration 2025 and the finalisation of a new ATI post-2025 declaration, the “Seville Declaration on DRM”.

While the ATI was able to significantly increase ODA for DRM since its launch at FfD3, its total share of aid remains small. The recent decline in ODA underscores the need for renewed commitment and innovative approaches to support country-led DRM reforms, which is reflected in the Seville Declaration on DRM. As countries navigate intersecting crises and seek to find solutions and effective partnerships, the 2023 ATI Monitoring Report provides a vital tool for tracking progress, identifying good practice and gaps. It promotes transparency and mutual accountability, supporting evidence-based dialogue on inclusive, fair, and efficient tax systems.

ATI Commitment 1

Introduction

The Addis Tax Initiative (ATI) aims to support partner countries in strengthening their domestic revenue mobilisation (DRM) to sustainably meet their development needs. By joining the ATI, partner countries commit to implementing reforms to enhance DRM, while ATI development partners pledge to support these efforts.

This chapter examines the progress made by the 33 ATI partner countries from 2021-2023[3], tracking their progress towards the four commitments outlined in the ATI Declaration 2025. It presents data on total revenue (both tax and non-tax), as well as the equity, efficiency, effectiveness and transparency of tax systems and revenue administrations.

The chapter begins with a summary of key findings, followed by an overview of the methodology, indicators, and data sources used to evaluate progress on ATI Commitment 1. It then provides an analysis of progress, incorporating insights from the monitoring surveys completed by ATI member countries.

Methodology

The assessment of DRM efforts among ATI member countries is conducted using a structured framework that evaluates key aspects of tax administration, such as efficiency, effectiveness, and transparency. This methodology draws on publicly available data sources to provide a comprehensive analysis of progress in meeting ATI Commitment 1, including:

Government Revenue Dataset (GRD): Produced by the International Centre for Tax and Development (ICTD) and managed by the United Nations University World Institute for Development Economics Research (UNU-WIDER), the GRD compiles government revenue data from multiple sources using a standardised classification system. It was selected as the primary source for 2021-2023 revenue levels due to its comprehensive and up-to-date data.

International Survey on Revenue Administration (ISORA): A joint web-based survey hosted by the International Monetary Fund (IMF) and developed in collaboration with various international and regional tax organisations. ISORA data is used to track the progress of ATI partner countries in improving the efficiency and effectiveness of their tax administrations.

African Tax Outlook Data Portal: Developed by the African Tax Administration Forum (ATAF), this portal provides detailed tax administration, customs, and macroeconomic data for 35 African countries, offering valuable insights into regional trends.

Commitment to Reducing Inequality (CRI) Index: Produced by Oxfam and Development Finance International (DFI), the CRI Index includes indicators that assess the progressivity of tax structures and their impact on reducing inequality.

Tax Justice Network (TJN) – Financial Secrecy Index: This index ranks jurisdictions based on

[3] At the time of this writing (June 2025), data for revenue-to-GDP ratio for 2023 was not yet available. The 2023 data will be included subsequently into the report once available.

their role in facilitating financial secrecy. This chapter specifically utilises TJN's Key Financial Secrecy Indicator (KFSI) number 11, which assesses tax administration capacity.

2023 ATI monitoring surveys on Commitment 1: This survey collected self-reported insights from ATI partner countries on their recent DRM reforms, tax administration effectiveness, and transparency. For the years 2021-2023, representatives from 16 partner countries, primarily from Ministries of Finance and revenue administrations, submitted full or partial responses.

Findings

Total revenues

Revenue-to-GDP ratio

In 2021, the average revenue-to-GDP ratio for the 28 ATI partner countries with available data[4] was 17.7%, marking a substantial increase from the 2020 ratio of 16.9%[5]. The lowest ratio was observed in Bangladesh at 9.31%, while Namibia had the highest at 30.43%.

The average revenue-to-GDP ratio in 2022 was 16.15%. However, the GRD only reports data for 20 of the 33 ATI partner countries, limiting comparability to 2021[6]. Namibia retained the highest ratio at 30.68% while Bangladesh continued to have the lowest ratio at 8.68%

In 2021, 20 ATI partner countries saw an increase in their revenue-to-GDP ratios compared to 2020, with an average 0.86 percentage point change.

[4] 2021 data was unavailable for Afghanistan, Cameroon, Ethiopia and Togo. Please also note that Afghanistan and Niger are currently suspended from the ATI.

[5] Please note that the 2020 ATI Monitoring Report presents a slightly different figure. The data source is the same, but as the GRD uses different data sources that may change and get updated over the years (both in terms of GDP and revenue), the figures are also subject to change.

[6] Countries with missing data for 2022: Afghanistan, Burkina Faso, Cameroon, Ecuador, Ethiopia, Georgia, Maldives, Mongolia, Pakistan, Paraguay, Philippines and Togo.

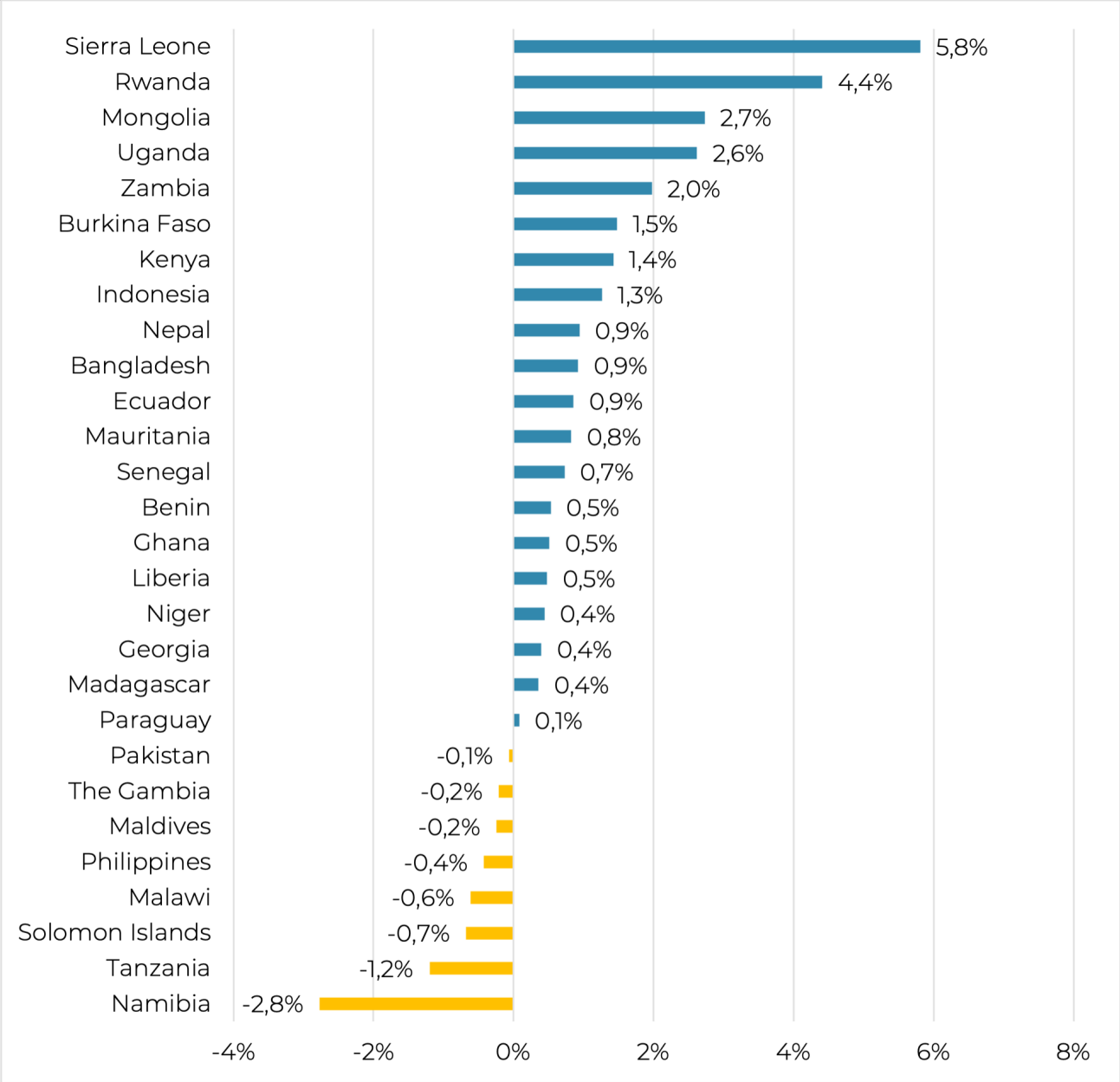

Figure 1.1 Revenue-to-GDP change, 2020-2021

Source: Government Revenue Dataset (ICTD-UNU-WIDER).

In 2022, 13 out of 20 countries with available data saw a decrease in their revenue-to-GDP ratios, with an average change of -0.98 percentage points. Only five (Senegal, Ghana, Benin, Mauritania, and Indonesia) demonstrated a sustained increase in revenue-to-GDP ratios from 2020 to 2022.

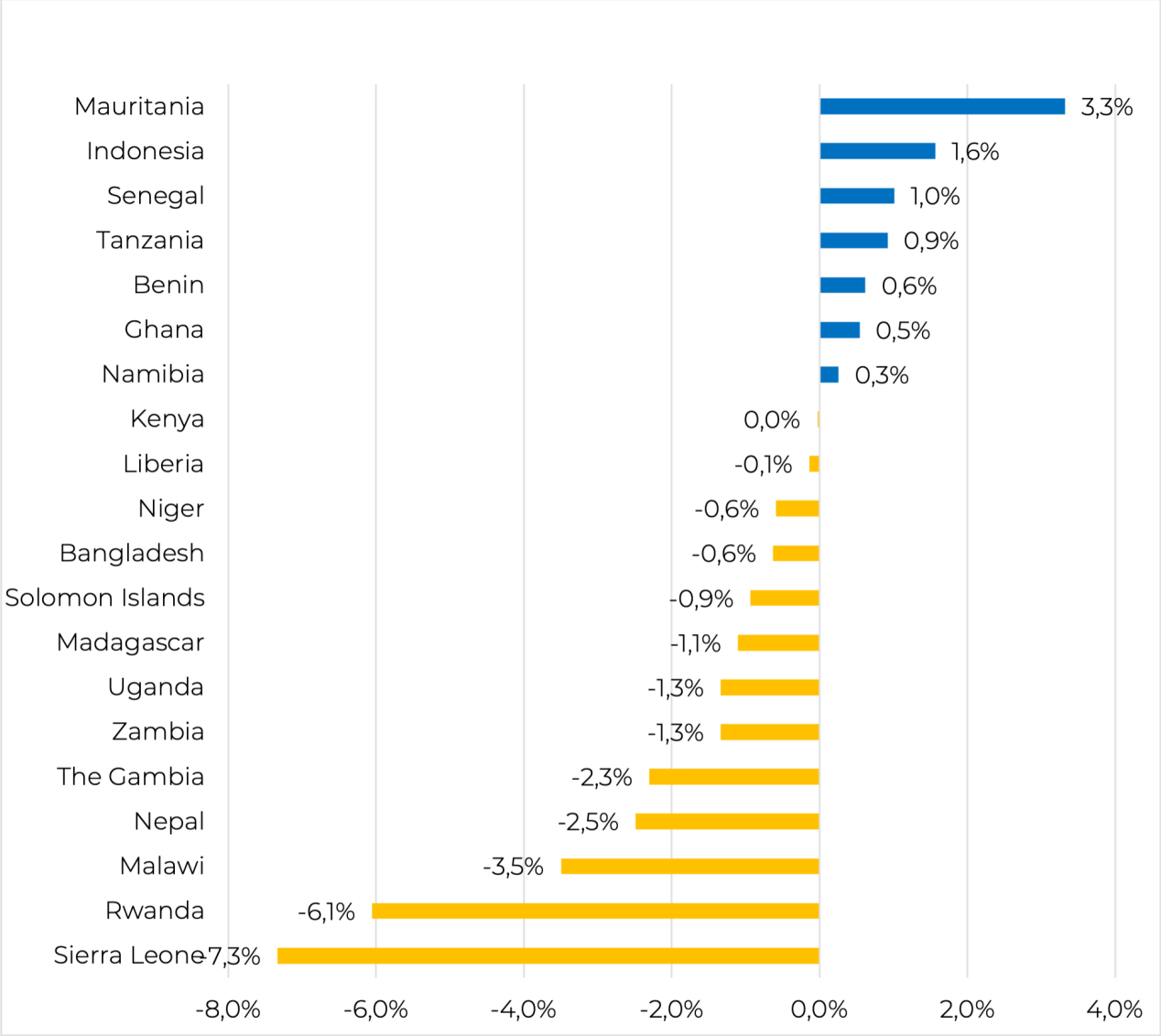

Figure 1.2 Revenue-to-GDP change, 2021-2022

Source: Government Revenue Dataset (ICTD-UNU-WIDER).

Revenue composition

Tax revenues constitute the largest source of government revenues for ATI partner countries. In 2020, the average proportion of tax revenues in total revenues was 84.42%. The largest proportion was observed in Uganda at 97.56% and the lowest in Mauritania at 58.16%. In 2021, the average proportion of tax revenues in total revenues was 84.17%. The lowest proportion was observed in Mauritania at 55.91% and the highest in Madagascar at 96.35%. The average proportion of tax revenues to total revenues in 2022 was 84.78%, with Mauritania and Madagascar again showing the lowest and highest proportions, respectively.

Figure 1.3 below shows the average composition of tax revenues across the period 2020 to 2022, broken down by four main categories.

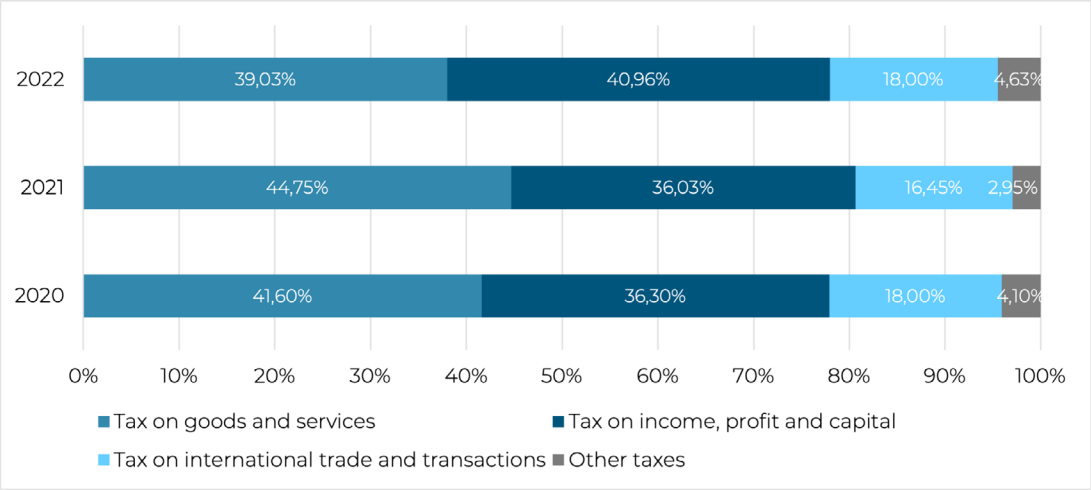

Figure 1.3 Average contribution to tax revenue, 2020-2022

Source: Government Revenue Dataset (ICTD-UNU-WIDER).

In 2020, taxes on goods and services were the largest source of revenue for ATI partner countries, contributing 41.6% of total tax revenue. Taxes on income, profit and capital gains made up 36.3% of total tax revenue, while taxes on international trade and transactions accounted for 18%, and other taxes at 4.1% of tax revenue.

In 2021, taxes on goods and services remained the largest source of revenue, comprising 44.75% of total tax revenue. Taxes on income, profit, and capital gains followed, contributing 36.03%. Taxes on international trade and transactions made up to 16.45%, while other taxes were 2.95% of total tax revenue.

Taxes on income, profit and capital gains were the most significant source of tax revenues in 2022 at 40.96%, overtaking taxes on goods and services (39.03%). Taxes on international trade and transactions accounted for 18% of total revenue, followed by other taxes at 4.63%. As noted in the 2021/22 ATI Monitoring Brief, the data included in the 2021 and 2022 averages differ due to data availability, thus changes between 2021 and 2022 cannot be interpreted as a trend.

Equitable taxation

As part of the ATI monitoring survey, partner countries are asked to describe any tax measures in place to improve gender equality and environmental sustainability. Seven[7] ATI partner countries indicated tax measures were in place to improve gender equality, compared to two[8] in 2020. Five countries provided additional details on these tax measures:

> **Bangladesh** has a higher tax-free income threshold for female taxpayers, as opposed to male taxpayers. Bangladesh also provides tax rebates to employers where third gender individuals[9] make up over 10% of employees, or more than 25 employees.
>
> In 2021, **Ecuador** announced that women's sanitary products (e.g., pads, tampons and menstrual cups) were not subject to Value Added Tax (VAT). Also, Ecuador's 2023 "Violet Economy Law" provides additional tax incentives (140% for up to three years) to private companies that create new jobs for women.
>
> In **Pakistan**, the government has made efforts to reduce the tax burden on women by reducing the tax payable on profits for women-owned enterprises by 25% for businesses started after July 2021.
>
> **Rwanda** revised the structure of its income tax in 2022 to support low-income earners, consisting predominantly of women. The 2023 VAT law also introduced exemptions on sanitary pads and powdered milk for bottle-fed babies.
>
> **Sierra Leone**'s Finance Act of 2021 provided a 6.5% income tax credit on the PAYE (pay as you earn) of a female employee for any business employing a woman in a management position between January 2021 and December 2023.

12[10] ATI partner countries indicated tax measures were in place to promote environmental sustainability, compared to six in 2020[11]. 10 partner countries included additional details on measures implemented since 2020 in their monitoring survey responses:

> In an effort to reduce carbon emissions, **Bangladesh** introduced a new environmental surcharge for individuals owning multiple cars in 2023, as well as a 1% environmental surcharge for environment hazard industries.
>
> **Georgia** has several tax policies to promote environmental sustainability, including exemption of electric vehicles from import duties, and VAT exemptions on the supply and import of electric buses. In addition, petroleum products are subject to high excise rates.
>
> **Ghana**'s tax policies aim to encourage environmental stability by implementing tax incentives to the tree cropping and horticulture industries.
>
> To curb wood burning and charcoal, **Madagascar** applies a 5% VAT reduction on bu-

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7 Bangladesh, Ecuador, Kenya, Nigeria, Pakistan, Rwanda and Sierra Leone.

8 It was previously reported that only Sierra Leone included tax measures to improve gender equality in their monitoring survey, however Benin also included a response.

9 Such as the Hijra community, where individuals identify as neither female nor male.

10 Bangladesh, Ecuador, Georgia, Ghana, Kenya, Madagascar, Maldives, Pakistan, Philippines, Rwanda, Sierra Leone and the Gambia.

11 Georgia, Kenya, Madagascar, Paraguay, Rwanda, and Sierra Leone.

tane gas. Madagascar also established an excise duty on the import of used vehicles to reduce air pollution, as well as an excise duty on precious stones and metals to limit environmental damage caused by extraction and mining.

The **Maldives** collects a green tax and a plastic bag fee, which fund the Green Fund to mitigate pollution and preserve the environment.

In **Pakistan**, a 25% tax credit is available to taxpayers on investments made in green industries.

In 2022, the **Philippines** put in place new legislation to support sustainable transport, such as tax exemptions for manufacturers, importers and buyers of electric vehicles, as well as tax deductions for companies implementing effective waste management and recycling programmes.

To incentivise sustainable transport, **Rwanda** has established tax exemptions on electric cars, charging stations and hybrid vehicles.

Sierra Leone has put in place several forestry levies, including clearance, timber harvest and charcoal licenses, as well as fees on charcoal exports, timber factories and transport permits.

The **Gambia** has levied a high tax on older vehicles to reduce emissions.

To assess the progressivity and equity of tax systems in ATI partner countries, the ATI Monitoring Report uses the CRI Index indicator T1a. The indicator uses a selection of proxies for a progressive tax structure, i.e., one that supports the redistribution of the national tax burden from lower to higher income households. Indicator T1a produces a score between 0 and 1, with higher scores indicating a more progressive and equitable tax structure.

The 2024 CRI Index includes data on all 33 ATI partner countries, with an average T1a score of 0.6, compared to an average of 0.49 of all countries assessed and 0.38 for OECD countries (see **Table 1.1**). Like the 2022 CRI Index, ATI partner countries continue to outperform more developed countries. The CRI Index notes that lower-income countries tend to perform better in tax progressivity compared to wealthier countries, as wealthier countries tend to have higher VAT rates and income tax rates that do not rise with income levels.

	2022	*2024*
ATI partner countries	0.57	0.6
OECD countries	0.37	0.38
All countries	0.48	0.49

Table 1.1 CRI Index Indicator T1a, average scores, 2022 and 2024

Source: CRI Index Indicator T1a, 2024

In 2024, six ATI partner countries scored above 0.7, with Togo achieving the highest score at 0.76. Additionally, 22 ATI partner countries improved their scores in 2024 compared to 2022 (see figure 1.7). The largest improvements were made by Burkina Faso (+0.14), who introduced a higher threshold for VAT, making it more progressive, and Benin (+0.13) due to improvements in the progressivity of personal income tax (PIT).

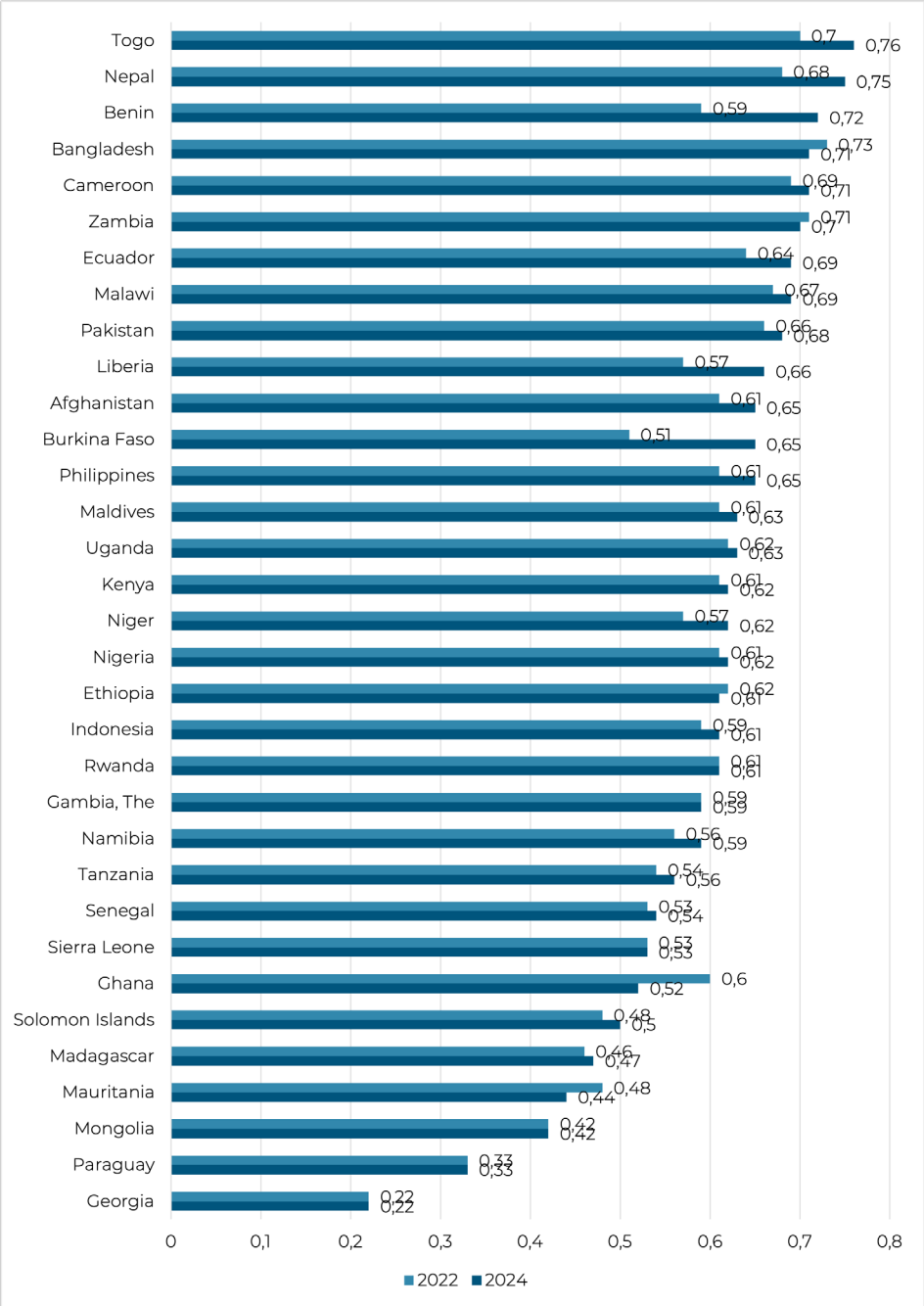

Figure 1.4 CRI Index Indicator T1a, ATI partner country scores, 2022 and 2024

Source: CRI Index Indicator T1a, 2024

In 2024, five ATI partner countries' scores decreased marginally compared to 2022, including Bangladesh (0.73 to 0.71), Ethiopia (0.62 to 0.61), Ghana (0.6 to 0.52), Mauritania (0.48 to 0.44) and Zambia (0.71 to 0.7). Georgia, Madagascar, Mauritania, Mongolia and Paraguay were among the lower scorers, all scoring below 0.5 in 2024. Scores for Georgia, Mongolia, Paraguay, Rwanda, Sierra Leone and the Gambia did not change between 2022 and 2024. See **annex 1.1** for the full CRI Index T1a data.

Effective, efficient and transparent revenue administration

As part of the 2025 ATI Declaration, ATI partner countries commit to strengthen the efficiency, effectiveness and transparency of their tax administrations, so that they function better in supporting DRM efforts. ATI development partners also commit to support these reforms in partner countries through increased DRM support towards equitable and effective tax systems. The ATI monitoring process assesses a wide range of indicators in order to monitor the implementation of these aspects, comparing 2021-2023 data against the baseline figures presented in the 2020 ATI Monitoring Report.

Managing large taxpayers and High Net Worth Individuals (HNWIs)

To promote tax compliance among more significant taxpayers, many countries dedicate administrative capacity to engage large and wealthy taxpayers (i.e., high net worth individuals, (HNWIs)). 29 ATI partner countries have set up Large Taxpayer Offices (LTOs) to engage with firms and individuals that have significant tax liabilities. In 2022, these offices managed an average of 61% of total net revenues collected across the countries. For ATI partner countries, this figure ranges from 10% in Senegal to 95% in Malawi (see **annex 1.2** for full data).

In 2022, the percentage of revenue administered under LTOs increased in 12 ATI partner countries, with the largest increases in Pakistan (up 62 percentage points, from 6% in 2020 to 68% in 2022), Ghana (up 50 percentage points, from 18% in 2020 to 68% in 2022) and Malawi (up 30 percentage points, from 65% in 2020 to 95% in 2022). 14 ATI partner countries saw a decrease in revenue administered under LTOs in 2022 compared to 2020, with the largest decreases in Sierra Leone (down 20 percentage points from 80% to 60%), Togo (down 15 percentage points from 80% to 65%) and Georgia (down 14 percentage points from 48% to 34%).

Eight ATI partner countries have set up units to engage HNWIs, however information on the proportion of revenue these units are able to mobilise remains limited[12]. 2022 ISORA data reports figures for seven ATI partner countries, ranging from 0% in Ghana, Kenya, Mongolia and Uganda, to 7% of total revenue in Indonesia. HNWI units also contributed to 1% of total revenue in Benin and Ecuador.

Withholding taxes

Withholding tax refers to taxes retained by one entity when making payments to another for goods supplied or services rendered by the payee. For employees, withholding tax is the money an employer deducts from an employee's gross wages and pays directly to the government, also referred to as PAYE tax. Withholding tax is an effective tool to improve DRM, both in terms

[12] Because ISORA data regarding revenue mobilised under HNWI units are isolated data points, the ATI Monitoring Report is not able to draw conclusions on trends in revenue mobilisation under HNWI units.

of increasing levels of DRM[13] as well as tax compliance and reporting behaviours.[14] Monitoring changes in withholding tax can provide insights into the effectiveness and efficiency of tax administrations.

The African Tax Outlook presents information on 12 African ATI partner countries and the percentage of withholding tax generated as a share of total tax revenues (see **table 1.2** below). Since 2020, five African ATI partner countries have increased the overall proportion of withholding taxes, while six have decreased.[15]

In 2023, withholding taxes made up 6.2% of total tax revenue on average in African ATI partner countries, a slight decrease from 2022. Senegal continues to have the highest ratio of withholding tax, at 14.85% in 2023 (down from 17.28% in 2022), followed by Malawi (9.02%) and Zambia (8.82%). The proportion of withholding tax remains low in Namibia at 1.13%, Togo (1.72%) and Benin (2.84%).

In 2023, only two African ATI partner countries increased the proportion of total revenue generated from withholding taxes compared to 2022: Uganda (up 0.6 percentage points) and Namibia (up 0.17 percentage points). While the proportion of withholding tax decreased among the remaining 10 African ATI partner countries, these represent a modest decline. The largest decrease was seen in the Gambia, down 2.68 percentage points, followed by Senegal (down 2.43 percentage points) and Ghana (down 1.67 percentage points).

In the Gambia, withholding tax revenue decreased by 12.65%, while total tax revenues increased by 39.49% on account of increases in VAT, PIT and CIT revenues. Similarly, Ghana's withholding tax revenue decreased by 3.84%, while total tax revenue grew by 37.41%, due to increases in VAT, PIT and CIT revenues. In Senegal, the level of withholding tax increased by 6.58%, however this is offset by a large increase in total tax revenues (24.03%) and results in a lower amount of withholding tax as a proportion of total tax revenues.

COUNTRY	*2020*	*2021*	*2022*	*2023*
Benin	2.90%	3.23%	3.07%	2.84%
Gambia	5.18%	5.11%	7.18%	4.50%
Ghana	9.23%	7.38%	5.58%	3.91%
Kenya	8.05%	8.19%	7.97%	7.61%
Liberia	7.66%	10.01%	9.17%	7.78%
Malawi	8.84%	9.40%	9.90%	9.02%
Namibia	1.37%	1.17%	0.96%	1.13%
Senegal	-	-	17.28%	14.85%
Tanzania	5.37%	6.18%	6.11%	5.82%

13 For example, a 2021 study found that when the United States introduced withholding tax there was an immediate and permanent increase in state income tax revenues by 29% (link).

14 Another 2021 study found that tax reporting increases with the level of tax over-withheld and decreases with the level of tax under-withheld (link).

15 Increased in Liberia, Malawi, Tanzania, Togo and Uganda; decreased in Benin, the Gambia, Ghana, Kenya, Namibia and Zambia. Data was not available for Senegal in 2020.

Togo	1.16%	1.66%	1.79%	1.72%
Uganda	5.47%	6.34%	5.77%	6.37%
Zambia	9.57%	9.60%	9.00%	8.82%
Average	5.89%	6.21%	6.98%	6.20%

Table 1.2 Withholding tax as a % of total tax revenues in African ATI partner countries, 2020-2023

Source: African Tax Outlook (ATO, ATAF)

Reporting across 25 ATI partner countries, ISORA data shows that 13 ATI partner countries have increased the percentage of PIT withheld and subsequently paid to tax administrations between 2020 and 2022, while nine experienced decreases in PIT withheld and paid to governments (see **annex 1.3**).[16] In 2022, the largest figures were reported for Benin, Kenya, Nigeria, Rwanda and Uganda, all at 100%. Between 2020 and 2022, the largest increases were reported for the Solomon Islands, which increased by 79 percentage points (from 10% to 89%), followed by Uganda (up 77 percentage points from 23% to 100%) and the Gambia (up 73 percentage points from 16% to 89%). The largest decrease was reported in Burkina Faso, falling from 99% to 13%, followed by a 47 percentage point decrease in Pakistan, from 80% to 33%. See **annex 1.3** for the full dataset.

VAT refunds

For 2022, data on the treatment of VAT refunds is available for 28 ATI partner countries (see **annex 1.4**). Seven (25%) ATI partner countries automatically pay out VAT refunds, and six (21.4%) pay out refunds subject to funds available. 14 ATI partner countries (50%) establish VAT refunds as 'credit'. Of these 14 partner countries, eight refund VAT credits on request and six refund credits subject to funds available.

The proportion of ATI partner countries that establish VAT as credits remains the same in 2022 compared to 2020 The number of ATI partner countries that automatically pay out refunds also remains the same. However, the makeup of countries that automatically pay out refunds has changed since 2020. Mauritania, Namibia and Togo paid out refunds automatically in 2022[17], while Madagascar, Mongolia and Pakistan all paid out subject to funds (having previously paid out automatically in 2020).

For 2022, ISORA data on the value of outstanding VAT credits as a proportion of overall VAT collected is available for 13 ATI partner countries. This figure continues to vary widely between ATI partner countries, ranging from 0% in Bangladesh to 59.3% in Zambia. Three ATI partner countries decreased the value of outstanding VAT credits in 2022 from 2020, with the largest decrease in Cameroon (2.7% compared to 21.9%), followed by Senegal (2.8% compared to 6.9%) and Ecuador (0.01% compared to 0.2%). The value of outstanding VAT credits increased in eight ATI partner countries, with the largest increase in Nepal (7% compared to 0%), followed by the Maldives (6.7% compared to 0%) and Paraguay (13.7% compared to 7.8%). See **annex 1.4** for the full 2022 dataset on VAT refunds.

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16 Data was not available for Afghanistan, Ethiopia, Mauritania, Nepal, Paraguay, the Philippines, Rwanda and Tanzania.

17 In 2020, Togo refunded credits subject to funds. Mauritania and Namibia joined as ATI partner countries following the previous 2020 ATI Monitoring exercise.

Timeliness of tax filings and payments

To understand how effectively tax systems are functioning, the ATI monitoring framework assesses the timeliness of tax return filing and payments. **Annex 1.5** presents data on the proportion of tax filings and payments for Corporate Income Tax (CIT), PIT, VAT and PAYE that were undertaken on-time across each of the ATI partner countries in 2020 and 2022.[18]

Table 1.3 below shows average on-time filing and payment rates across all ATI partner countries where data was available. Since 2020, average on-time filing rates improved for CIT (+1.4 percentage points), VAT (+21.6 percentage points) and PAYE (+17.6 percentage points). The average on-time payment rate for CIT also increased by 2.8 percentage points.

The average on-time filing rate for PIT fell in 2022 by 6.1 percentage points. Average on-time payment rates decreased for PIT (-14.7 percentage points), VAT (-25.7 percentage points) and PAYE (-24.3 percentage points).

On-time filing rates for VAT and PAYE perform better than their respective on-time payment rates in 2022. The average on-time payment rate continues to outperform filing rates for both CIT and PIT in 2022.

	2020	*2022*	
On-time filing rate – CIT	43.0%	44.4%	↑
On-time payment rate – CIT	79.6%	82.5%	↑
On-time filing rate – PIT	46.5%	40.4%	↓
On-time payment rate – PIT	83.1%	68.4%	↓
On-time filing rate – VAT	67.5%	89.1%	↑
On-time payment rate – VAT	97.1%	71.4%	↓
On-time filing rate – PAYE	63.4%	81.0%	↑
On-time payment rate – PAYE	89.8%	65.5%	↓

Table 1.3 On-time filing and payment rates (%), ATI partner country average, 2020 and 2022

Source: ISORA, 2022

[18] ISORA data is only available up to 2022.

Filing and payment rates for individual ATI partner countries, however, portray mixed progress between 2020 and 2022, and a number of outliers contribute to large jumps in aggregate rates (see **table 1.4** below). Looking at on-time payment rates, there were notable jumps in Liberia (PIT), Madagascar (VAT, PAYE), Togo (CIT and PAYE) and Zambia (CIT, PAYE).

		2020		*2022*	
COUNTRY	*Tax type*	Expected payments (millions, local currency)	Actual payments (millions, local currency)	Expected payments (millions, local currency)	Actual payments (millions, local currency)
Liberia	PIT	0.31	0.30	119.66	0.18
Madagascar	VAT	911,290.00	551,827.24	817,806.96	7,414.73
Madagascar	PAYE	490,420.00	264,538.73	410,895.77	8,914.59
Togo	CIT	81,560.32	73,372.51	164,026.05	76,854.91
Togo	PAYE	42,994.16	37,573.77	29,554.31	7,742.70
Zambia	CIT	150,237.33	22,847.87	17,319.98	13,084.30
Zambia	PAYE	28,445.99	7,744.64	14,922.58	9,331.67

Table 1.4 Changes in expected and actual payments, 2020-2022

Between 2020 and 2022, Liberia recorded a large increase in expected PIT payments while actual payments decreased, accounting for the 96.4 percentage point decrease in on-time PIT payment rate.

ISORA data indicates that the on-time VAT payment rate in Madagascar decreased by 59.7 percentage points, largely due to a sharp decline in actual payments in 2022 compared to expected payments. This is also the case for Madagascar's on-time PAYE payment rate, which declined by 51.7 percentage points.

In Togo, expected CIT payments more than doubled, while actual payments rose marginally by comparison. This resulted in a decrease of 43.1 percentage points between 2020 and 2022. Togo's expected PAYE payments, however, decreased in 2022. This is met with a significant drop in actual payments, representing a decrease of 61.2 percentage points.

The on-time CIT payment rate in Zambia increased by 60.3 percentage points between 2020 and 2022 due to a large drop in expected CIT payments. This is also the case for increase in on-time PAYE payments, where expected payments halved in 2022, accompanied by an increase in actual payments.

Large swings in on-time payment rates may reflect the prolonged recovery from the COVID-19 pandemic. In some cases, increases in expected payments were driven by the expiration of tem-

porary tax relief measures introduced to help businesses and individuals cope during the pandemic; as these measures ended, deferred taxes became due. However, in Liberia and Togo, actual payments did not rise to match expected levels, leading to a decline in payment rates. In countries where expected payments decreased (likely due to ongoing post-pandemic tax policies), actual payments fell even more sharply, also resulting in lower payment rates. In Zambia, by contrast, expected CIT payments decreased more than actual payments, which pushed up the payment rate, while actual PAYE payments increased following a rise in the PAYE exemption threshold.

Further clarification from Madagascar's ISORA focal point notes that significant variations in the data may also be due electronic systems not capturing declarations from small businesses, as these are maintained manually and are not systematic. Ecuador's ISORA focal point also noted that significant variations in the data are due to calculations based on different data sources between 2020 and 2022.

No ATI partner country improved filing and payment rates across all categories between 2020 and 2022. Of the seven ATI partner countries with complete data for both 2020 and 2022, six present mixed results, while on-time payment and filing rates in Madagascar have decreased across all categories.

Table 1.5 shows changes for on-time filing and payment rates for CIT, PIT, and VAT for all ATI partner countries with available data from 2020-2022.

COUNTRY	On-time filing rate % - CIT	On-time payment rate % - CIT	On-time filing rate % - PIT	On-time payment rate % - PIT	On-time filing rate % - VAT	On-time payment rate % - VAT	On-time filing rate % - PAYE	On-time payment rate % - PAYE
Afghanistan	-	-	-	-	-	-	-	-
Bangladesh	11.80	-	26.4	-	28.5	-	-	-
Benin	18.80	-	10	-	-3.6	-21	-2.5	-
Burkina Faso	35.90	-	-28	-	5.5	-	6.7	-
Cameroon	-	-	-	-	-	-	-	-
Ecuador	19.30	4.3	5.3	3.8	2.5	-13.1	32.1	-60.9
Ethiopia	-	-	-	-	-	-	-	-
The Gambia	-	-	-	-	-	-	-	-
Georgia	19.00	2.1	8.5	-1.6	4.7	-6	24	-3.6
Ghana	-26.90	-11.5	7	-16.3	-11.1	-	-5.6	-3.7
Indonesia	-6.50	-2.2	-36.1	-5.4	-	-0.3	-	0.2
Kenya	-5.10	-12.8	-0.1	0	23.4	21.1	10.7	30.4
Liberia	-1.90	-27.2	-3.9	-96.4	-	-	-9.7	5.7
Madagascar	-61.10	-2	-29.7	-0.3	-42	-59.7	-51.2	-51.7
Malawi	-33.60	-	-37.8	-	588.2	-	-	-
Maldives	17.10	-8.7	17.8	-0.5	-1.8	7.9	9.8	2.8
Mauritania	-	-	-	-	-	-	-	-
Mongolia	3.60	-10.7	46	10.6	-11.8	14	-2.5	-11.1
Namibia	14.70	-	-27.1	-	-24.8	-	-43.3	-
Nepal	10.40	-	-	-	20.1	-	-	-
Niger	-	-	-	-	-	-	-	-
Nigeria	-	-	-	-	-	-	-	-
Pakistan	-	-	-	-	-	-	-	-
Paraguay	-16.00	-	-	-	-13.7	-	-	-
Philippines	-	-	-	-	-	-	-	-
Rwanda	-	-	-	-	-	-	-	-
Senegal	1.60	-	2.7	-	-2	-	-57	-
Sierra Leone	-13.80	-	-38.8	-	-32.4	-	-8.2	-
Tanzania	-	-	-	-	-	-	-	-
Togo	-	-43.1	-	-9.5	-45.5	-	-	-61.2
Uganda	-5.60	28.5	4.7	-17.4	-7.9	24.6	-7.9	-18.4
Zambia	-27.50	60.3	-	-	-20.6	20.8	-63	35.3

Table 1.5 Changes in on-time filing and payment rates in ATI partner countries, 2020-2022 (percentage points)

Source: ISORA, 2020-2022

Tax gaps and arrears

The effectiveness of tax administrations can also be measured by the proportion of the total potential tax that can be collected versus what is actually collected, commonly referred to as the tax gap. This gap consists of two components: the tax compliance gap and the tax policy gap. Tax compliance gaps can emerge when taxpayers fail to pay the required taxes due to evasion, late payments, errors or underreporting. Tax policy gaps are the result of government decisions that reduce potential tax revenue, such as tax exemptions, lower tax rates for certain industries, or tax holidays to attract investment. It is important for tax administrations to understand the extent of existing tax gaps so that they can implement measures to improve compliance, refine tax policies and increase tax revenues. However, there are risks associated with tax gap estimations. For example, tax gap estimation can place pressure on tax administrators by creating unrealistic expectations to close gaps quickly, despite limited resources. Additionally, tax gap estimation is resource-intensive, requiring significant data, expertise and time to produce accurate estimates.

16 ATI partner countries shared information on PIT, CIT and VAT tax gap analysis in their monitoring survey responses, and 11 noted they had undertaken a gap analysis for at least one tax type (see **annex 1.6**). 11[19] countries have conducted tax gap analysis on VAT, up from eight in 2020. Six[20] ATI partners have conducted a tax gap analysis on PIT, up from one in 2020, and five[21] have conducted tax gap analysis on CIT, up from three in 2020.

Two ATI partner countries have indicated that they conduct tax gap analysis on a regular basis. Rwanda noted in their survey response that a tax gap analysis is conducted for VAT every two years, and Ghana produces a VAT tax gap analysis annually.

Since 2020, the overall increase in ATI partner countries who have undertaken tax gap analysis is a promising step towards improved effectiveness of tax administrations. However, to ensure sustained improvements in their administrations, ATI partner countries should assess their tax gaps more regularly. See **annex 1.6** for additional data on tax gap analysis.

The ATI Monitoring Report evaluates unpaid tax liabilities as a component of the tax gap. This assessment includes taxes that have been officially recorded as owed but remain unpaid. These figures are derived from analysing ISORA data on the closing stock of tax arrears at year end. In 2022, tax arrears averaged 52.41% of total tax revenue across ATI partner countries, up from 31% in 2020. ATI partner country figures ranged from a low of 0.7% in Paraguay, 3.6% in Ghana and 3.9% in Indonesia, to a high of 118.5% in Zambia, 170.3% in Namibia and 514.3% in the Solomon Islands[22].

Between 2020 and 2022, the Maldives saw the largest decrease in closing stock of tax arrears at year end, decreasing to 65.9% from 194.6% of total tax revenue,[23] followed by Kenya (decreasing

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19 Ecuador, Georgia, Ghana, Indonesia, Kenya, Madagascar, Pakistan, Philippines, Rwanda, Sierra Leone and Zambia.

20 Ecuador, Kenya, Pakistan, Philippines, Sierra Leone and Zambia.

21 Kenya, Pakistan, Philippines, Sierra Leone and Zambia.

22 Closing stock of tax arrears (%) is calculated by taking the total closing stock of arrears at year end and dividing it by the total net tax revenue collected. Where total arrears are larger than total net revenue collected by the tax administration, the percentage will be greater than 100%. For example, in the Solomon Islands, the amount of tax still to be collected at year end was five times the amount of net revenue collected in 2022.

23 The large decrease in the Maldives is due to a nearly 30% decrease in closing stock of arrears and a doubling of total net revenue collected by MIRA.

to 59.5% from 132.7%)[24] and Georgia (decreasing to 22.7% from 39.6%)[25]. Closing stock of tax arrears increased the most in the Solomon Islands, to 514.3% from 1.6%, followed by Namibia, to 170.3% from 12.2% in 2020.

Of the 24 ATI partner countries with data for both 2020 and 2022, the closing stock of tax arrears for 14 countries decreased, while for 10 countries closing stock of tax arrears increased (see **annex 1.7** for more details). For the 14 countries where tax arrears decreased, this indicates improved effectiveness of tax authorities to collect taxes owed. At the aggregate level, these improvements result in a 5.4 percentage point decrease in average closing stock of tax arrears in 2022, and represents a positive change following the economic impacts of the COVID-19 pandemic.[26] As many countries experienced the economic shocks of lockdowns in 2020 and 2021, levels of non-compliance grew. While governments were quick to implement tax forbearance and relief measures for direct taxes and indirect taxes, alongside weakened tax administration and capacity, this decreased revenue potential[27]. While economic conditions, particularly in African countries, gradually started to improve by 2022, progress has been slow to return to pre-COVID-19 levels in some countries, as evidenced by the varied levels of tax arrears across ATI partner countries.

Tax administration commitments and responsibilities

The ATI monitoring framework assesses the transparency of revenue administrations and whether tax authorities provide taxpayers with adequate information to comply with their tax duties. This includes an indicator on the proportion of ATI partner countries that publish a taxpayer service charter emphasising taxpayers' rights[28] and obligations[29].

Based on the ATI monitoring survey responses, as well as a review of tax authority websites, tax charters or similar documents were identified for 24 ATI partner countries.[30] This represents a large increase compared to 2020, where 15 ATI partner countries had tax charters setting out taxpayer rights and obligations. Only one country, Liberia, indicated in their survey response that they did not have an accessible taxpayer service charter, despite having had one in 2020. The overall increase in ATI partner countries with tax charters shows a marked improvement in revenue administration transparency.

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24 In Kenya, this is due to a 38% decrease in closing stock of arrears at year end in 2022 compared to 2020, and a 38% increase in total net revenue collected by the tax administration.

25 In Georgia, this is due to a 75% increase in net revenue collected, while closing stock of arrears remained the same in 2022 compared to 2020.

26 This figure excludes the large outlier of the Solomon Islands. Including the Solomon Islands increases the average closing stock of tax arrears by 13.8 percentage points.

27 IMF (2022) Revenue Mobilization in Sub-Saharan Africa during the Pandemic. Available at: https://www.imf.org/-/media/Files/Publications/covid19-special-notes/en-covid-19-special-series-revenue-mobilization-in-ssa-during-the-covid-19-pandemic.ashx.

28 Such as fair and reasonable assistance for taxpayers, reasonable cost of compliance, and a fair and impartial appeals procedure.

29 Including complete and honest disclosure of facts and information, maintaining accounting records and documents as prescribed under income tax law, and timely filing and payment of taxes.

30 Bangladesh, Benin, Cameroon, Ecuador, Ethiopia, the Gambia, Georgia, Ghana, Kenya, Madagascar, Malawi, Maldives, Mauritania, Namibia, Nepal, Niger, Nigeria, Pakistan, Philippines, Rwanda, Solomon Islands, Tanzania, Uganda and Zambia.

DRM support by ATI development partners towards equitable, efficient, effective and transparent tax systems

The ATI Declaration 2025 commits development partners to support partner countries in building more equitable, efficient, effective, and transparent tax systems.[31] Based on Oxfam's three tier methodology analysing ODA for DRM, this section presents analysis on the extent to which ATI development partners dispersed ODA between 2021 and 2023 to promote equity outcomes in partner countries, and also to support the development of efficient, effective, and transparent tax systems. It also identifies which ATI partner countries were the most significant recipients of ODA focussed on these agendas.

Equitable tax systems

In 2021, nearly 32% of ODA for DRM across all ATI development partners was focused in some way on promoting equity outcomes (down from 40% in 2020). A further breakdown of DRM projects indicates that 12.3% of projects promote tax fairness (down from 17% in 2020), and 5.9% promote gender equity (up from 3% in 2020). Additionally, 14.8% emphasise equity in relation to corporate income (down from 17% in 2020), 6.5% promote equity in relation to extractive industries (up from 4% in 2020). 1.9% of DRM projects in 2021 emphasise equity in relation to personal income, while 0.7% emphasise equity in relation to wealth taxation, 2.9% in relation to property taxation and 1.1% in relation to tax expenditure[32].

In 2022, 28.5% of DRM projects across all ATI development partners focused on promoting equity outcomes, down from 32% in 2021. 14.1% of projects promote tax fairness (up from 12.3% in 2021) and 5.4% promote gender equity, down from 5.9% in 2021 but still higher than the proportion in 2020. 12.7% of projects emphasise equity in relation to corporate income (down from 14.8% in 2021) and 4.6% promote equity in relation to extractive industries (down from 6.5% in 2021, however still above 2020 levels). 3.2% of DRM projects emphasise equity in relation to personal income (up from 1.9% in 2021), while 3.7% emphasise equity in relation to wealth taxation (up from 0.7% in 2021), 2.3% in relation to property taxation (down from 2.9% in 2021) and 0.6% in relation to tax expenditure (down from 1.1% in 2021).

In 2023, the proportion of DRM projects across ATI development partners that focused on promoting equity outcomes increased to 35.7%, exceeding 2021 and 2022 levels, though still below the 2020 figure. 16.3% of projects promote tax fairness (up from 14.1% in 2022) and 6.7% promote gender equity (up from 5.4% in 2022). 13.1% of projects emphasised equity in relation to corporate income (up from 12.7% in 2022), 5% in relation to extractive industries (up from 4.6% in 2022), 3% in relation to personal income (down slightly from 3.2% in 2022), 5.5% in relation to wealth taxation (up from 3.7% in 2022), 2.5% in relation to property taxation (up slightly from 2.3% in 2022) and 1% in relation to tax expenditure (up from 0.6% in 2022).

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31 This methodology utilises key word searches of project level information published by development partners and additional quality assurance checks of this information in order to distinguish projects that aim to address issues related to equity and gender equality. The full methodology can be accessed *here*.

32 These categories of equity are not mutually exclusive, as an individual project can address more than one element of equity. Therefore, the total percentage of these sub-categories exceeds the proportion of all ODA for DRM from ATI DPs in 2021 that addressed equity in some way.

	General equity outcomes	*Tax fair-ness*	*Gen-der equity*	*Cor-porate income*	*Ex-tractive indus-tries*	*Per-sonal income*	*Wealth taxa-tion*	*Proper-ty taxa-tion*	*Tax-expe diture*
2021	32.0%	12.3%	5.9%	14.8%	6.5%	1.9%	0.7%	2.9%	1.1%
2022	28.5%	14.1%	5.4%	12.7%	4.6%	3.2%	3.7%	2.3%	0.6%
2023	35.7%	16.3%	6.7%	13.1%	5.0%	3.0%	5.5%	2.5%	1.0%

Table 1.6 Equity focus of ODA for DRM projects, 2021-2023

Source: ATI DRM Database

Development partners with the highest proportion of ODA for DRM focusing on equity outcomes were as follows:

- 2021: Finland (100%, USD 4 million), Canada (80.6%, USD 7.9 million) and the Netherlands (77.4%, USD 8.9 million).
- 2022: Finland (100%, USD 9.2 million), Australia (88.5%, USD 12.7 million) and Canada (84.4%, USD 5.1 million).
- 2023: Belgium (100%, USD 1.3 million), Finland (87.8%, USD 5.1 million) and Canada (76.6%, USD 4.1 million)

The most significant contributors in value terms focusing on equity outcomes were:

- 2021: Norway (USD 19.44 million), EU (USD 14.9 million) and the United States (USD 12.7 million).
- 2022: EU (USD 16 million), Norway (USD 15.7 million) and Australia (USD 12.7 million).
- 2023: EU (USD 24.3 million), Norway (USD 16.3 million) and Switzerland (USD 12.5 million)

Efficiency, effectiveness and transparency of tax administrations

In 2021, 31.3% of overall ODA for DRM supported strengthening the efficiency, effectiveness and transparency of tax administrations[33]. Analysis suggests that 9.7% of total ODA for DRM in 2021 specifically supported ATI partner countries to improve the efficiency, effectiveness and transparency of their tax administrations, down from 16% in 2020. In 2022, this decreased to 23.1%, with 4.5% allocated to ATI partner countries. In 2023, this increased to 32.3% of overall, with 7.1% allocated to ATI partner countries.

Development partners with the highest proportion of ODA for DRM supporting efficient, effective and transparent tax administrations were as follows:

- 2021: Ireland (100%, USD 0.5 million), Finland (92.6%, USD 3.7 million) and Canada (87.4%, USD 8.6 million).
- 2022: Finland (90.3%, USD 8.3 million), Sweden (89.8%, USD 8.7 million) and Canada (82.7%, USD 5 million).

[33] This analysis is based on key word searches of project level information published by development partners, including key terms: *efficient, efficiency, administration, and transparency.*

- 2023: the Slovak Republic (100%, USD 0.005 million), Finland (94.5%, USD 5.5 million) and Sweden (89.3%, USD 9.4 million).

In value terms, the largest contributors were as follows:

- 2021: EU (USD 23.8 million), Germany (USD 21.5 million) and UK (USD 9 million).
- 2022: EU (USD 17.2 million), Norway (USD 12.2 million) and Sweden (USD 8.7 million).
- 2023: EU (USD 22.7 million), Norway (USD 12.1 million) and Switzerland (10.7 million).

Amongst ATI partner countries that received at least USD 2 million in ODA disbursements[34] for DRM, those with the highest proportion focusing on strengthening the efficiency, effectiveness and transparency of their tax administrations included:

- 2021: Liberia (100%, USD 2.4 million), Afghanistan (95.6%, USD 10.6 million) and Malawi (80%, USD 2.4 million).
- 2022: Mongolia (38.1%, USD 1.1 million), Burkina Faso (34.7%, USD 1.9 million) and Zambia (33.6%, USD 1.6 million).
- 2023: Ecuador (100%, USD 2.6 million), Malawi (71.3%, USD 2.3 million) and Nigeria (50.8%, USD 1.6 million).

Those that received the highest absolute level of ODA focused on these agendas included:

- 2021: Afghanistan (USD 10.6 million), Indonesia (USD 3.7 million) and Liberia (USD 2.4 million).
- 2022: Tanzania (USD 2.3 million), Burkina Faso (USD 1.9 million) and Indonesia (USD 1.6 million).
- 2023: Ecuador (USD 2.6 million), Malawi (USD 2.3 million) and Zambia (USD 2.1 million).

[34] Since 2020, the ATI only monitors disbursement data.

Case Study

Tax incentives for gender equality: Ecuador's Violet Economy law

Enacted in 2023, Ecuador's Violet Economy Law represents a significant milestone in promoting gender equality and enhancing women's participation in the workforce. Among its key provisions, the law introduced substantial tax incentives for businesses to create new job opportunities for women, as well as policies that foster more inclusive work environments. These incentives aim to encourage corporate investment in gender parity, and while robust data is not yet available to confirm the impact of the law on inclusive employment practices, efforts to implement the law demonstrate promising early outcomes.

The Violet Economy Law offers tax deductions of up to 140%[35] on the salaries and social security contributions for newly hired female employees.[36] This incentive applies for up to three fiscal years, provided that women comprise at least 50% of the company's total new hires.[37] The law also stipulates that companies appoint at least one woman for every three men to its Board of Directors.[38]

Beyond direct tax benefits, the Violet Economy Law mandates that businesses with over 50 employees develop a four-year Employment Equality Plan (EEP) to assess gender bias in hiring, promotions, pay structures, work arrangements, HR and training opportunities.[39] Businesses maintaining compliance with gender-equality initiatives, including EEPs and sexual harassment prevention programmes, can apply for the Sello Violeta, or Violet Seal, a certification awarded by the Ministry of Labour that qualifies them for additional tax breaks.[40]

Efforts to accelerate the law's implementation has led to some early improvements in female employment rates. The World Economic Forum (WEF) reports that private sector participation in the initiative has been substantial, with over 150 companies engaged to adopt inclusive hiring practices. Collaborative efforts in a WEF accelerator programme in support of the Violet Economy Law has resulted in a 33% increase in female workforce participation in small businesses and a 23% rise in large corporations.[41]

As Ecuador continues to expand the reach of the Violet Economy Law, critical next steps include establishing evaluation systems to ensure the effective implementation of policies; integrating the law within existing legislation to address gender barriers in the labour market; and strength-

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35 This 140% deduction means that if a woman is employed in a new position for ten consecutive months within a fiscal year, the employer can deduct 140% of her salary and associated social security contributions from their taxable income.

36 Ramos, E. (2023) Law to promote the violet economy. Available at: https://corralrosales.com/en/law-to-promote-the-violet-economy/; Pino Arroba, D. et al. (n.d.) Ecuador: An introduction to corporate/commercial. Available at: https://chambers.com/content/item/5224

37 Ramos, E. (2023) Law to promote the violet economy. Available at: https://corralrosales.com/en/law-to-promote-the-violet-economy/

38 Pino Arroba, D. et al. (n.d.) Ecuador: An introduction to corporate/commercial. Available at: https://chambers.com/content/item/5224

39 Sanchez, J. (2023) Ecuador: New employer requirements to strengthen gender equality at work. Available at: https://www.wtwco.com/en-mu/insights/2023/12/ecuador-new-employer-requirements-to-strengthen-gender-equality-at-work

40 Ibid.

41 World Economic Forum (2025) 17 economies, 1 mission: Accelerating economic gender parity by 2030. Available at: https://www.weforum.org/impact/17-economies-1-mission-accelerating-economic-gender-parity-by-2030/

ening public-private partnerships to maintain their continued buy-in for reform, particularly given the increased administrative burden of compliance.[42]

Ecuador's Violet Economy Law demonstrates how tax incentives can be used to drive progress toward gender equality in the workplace. By offering financial benefits to businesses committed to hiring and retaining female employees, the law enhances women's economic participation, contributing to a more balanced and equitable labour market. If effectively maintained and expanded, these incentives could pave the way for lasting social and economic transformation in Ecuador and beyond.

Expert piece

Digital public infrastructure in tax administration: opportunities and challenges

Expert piece prepared by Fabrizio Santoro Giulia Mascagni International Centre for Tax and Development (ICTD)

Digital Public Infrastructure (DPI) has emerged as a transformative force in tax administration, promising to enhance DRM while addressing some of the most persistent challenges in the tax systems.[43] For success stories like India,[44] Brazil and Estonia, DPI encompasses platforms and tools such as digital ID systems, payment platforms, and interoperable data-sharing mechanisms, which together could provide a foundation for building more efficient, transparent and inclusive tax systems.

At its core, DPI offers opportunities to modernise tax administration. It can enhance taxpayer registration, compliance, and collection by integrating digital ID systems with tax registries. For example, Ghana and Uganda have demonstrated how ID-based tax registration systems can bring informal businesses into the tax net. Payment platforms — such as mobile money services — can expand the reach of tax collection, especially if adoption is incentivised with effective fiscal measures. Meanwhile, data-sharing mechanisms between government agencies provide tax authorities with new insights to identify and address tax evasion, making audits more targeted and cost-effective while enhancing transparency and fairness in tax enforcement.

Despite these benefits, the adoption of DPI also introduces significant challenges. For one, developing and maintaining such infrastructure requires substantial investment in technology, human resources and institutional capacity — resources that many low-income countries may lack.[45] In addition, interoperability, a cornerstone of effective DPI, depends on coordination among various government agencies, which often face misaligned incentives and institutional silos. Data secu-

42 IMF (2024) Tackling the gender gap in Ecuador's labor market. Available at: https://www.elibrary.imf.org/view/journals/002/2024/358/article-A002-en.xml

43 Santoro, F.; Prichard, W.; and Mascagni, G. (2024) Digital IDs and Digital Payments – Opportunities and Challenges for Tax Administration, ICTD Policy Brief 7, Brighton: Institute of Development Studies. Available at https://www.ictd.ac/publication/digitalisation-of-tax-administration/

44 Alonso, C. T. Bhojwani, E. Hanedar, D. Prihardini, G. Una and K. Zhabska. "Stacking up the Benefits: Lessons from India's digital journey" IMF Working Paper No. 23/78. Available at: https://www.imf.org/en/Publications/WP/Issues/2023/03/31/Stacking-up-the-Benefits-Lessons-from-Indias-Digital-Journey-531692

45 Oyebola Okunogbe, Fabrizio Santoro, The Promise and Limitations of Information Technology for Tax Mobilization, The World Bank Research Observer, 2022

rity and privacy concerns also pose risks, as digital tax systems are vulnerable to breaches and misuse, potentially eroding taxpayer trust.

Moreover, the rapid adoption of DPI can exacerbate existing inequalities. If not carefully designed, digital tax systems may disproportionately affect marginalised groups, such as women or small informal businesses, who may lack access to the digital tools required for compliance. Addressing such inequities requires a strong focus on accessibility, user-centric design, and capacity-building initiatives for taxpayers.

The political economy of DPI adoption further complicates the picture. Tax administrations must navigate resistance from vested interests, including taxpayers who benefit from the status quo, bureaucrats wary of change and public or private actors unwilling to integrate their systems. Building public trust is crucial, as DPI adoption can be seen as intrusive if taxpayers perceive it as a tool for increased surveillance without corresponding improvements in public service delivery.

Navigating these dynamics requires a balanced and pragmatic approach, focusing on the foundations for a successful digital reform:

1. Make effective use of existing data, for instance real-time information from electronic fiscal devices, before seeking out new sources of big data.
2. Integrate data into core processes and functions, through automated cross-checking and validation controls, and data-driven risk profiling and auditing.
3. Invest in skills and institutional capacity to verify and use data strategically.
4. Create strong data protection systems and data governance frameworks to build public trust and break silo mentality in public and private actors.
5. Prioritise interoperability and collaboration across government agencies, and with the industry, foster an integrated approach to digital governance. Examples include integrating different government revenue management systems (domestic and customs), fostering interoperability across payment service providers and tax e-payment platforms (see RSwitch in Rwanda), thus democratising accessibility.

The promise of DPI in tax administration is undeniable, offering a path to modernisation and improved revenue mobilisation. However, achieving these outcomes requires deliberate policy design, substantial investment, and sustained political will. By addressing the opportunities and challenges of DPI holistically, governments can unlock its potential to build more inclusive, resilient, and effective tax systems.

ATI Commitment 2

Introduction

In support of ATI's core objective to help partner countries strengthen their domestic revenue mobilisation (DRM), ATI development partners have committed to collectively maintain or exceed the 2020 global target level of DRM (USD 441.1 million).

This chapter examines the efforts of the 20 ATI development partners to meet or surpass this target and presents data on Official Development Assistance (ODA) disbursements for DRM between 2021 – 2023, including development partner performance relative to the target, as well as trends in disbursements by recipient country, delivery channel and support type.

In addition, the chapter offers insights into the strategic, policy and programmatic approaches used by development partners to support DRM, with a particular focus on their efforts to enhance country ownership of tax reforms.

Methodology

ATI Commitment 2 is monitored using ODA data collected and published by the OECD Development Assistance Committee (DAC) through its Creditor Reporting System (CRS). The CRS database is the primary source of official, standardised, and comparable statistics on ODA, including support for DRM. Data collection from DAC members follows a standard methodology and agreed definitions.[46]

The monitoring exercise focuses on ODA disbursements, which reflect the actual international transfer of funds and serve as a concrete measure of the efforts made by development partners. The disbursement data cited in this report are primarily reported on a gross basis, i.e., without deducting reflows such as loan repayments or grant recoveries, and include both grants and loans.

As part of the monitoring process, ATI development partners were invited to review and adjust the information they reported to the OECD DAC on ODA in support of DRM. The final data, once reviewed and confirmed by development partners, is compiled into a database and forms the basis of the analysis presented in this report.

In addition to CRS data validation, ATI development partners were asked to complete a supplementary survey comprising of six questions on their DRM support. Fifteen partners responded to the 2023 monitoring survey. Notably, the survey includes a specific indicator on country-owned tax reforms, which assesses the efforts of ATI development partners to enhance country ownership of tax reforms in partner countries.

Further details on the ATI monitoring process under the ATI Declaration 2025 are available *here*.

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[46] OECD DAC CRS guidelines define purpose code 15114 as "support to domestic revenue mobilisation/tax policy, analysis and administration as well as non-tax public revenue, which includes work with ministries of finance, line ministries, revenue authorities or other local, regional or national public bodies" (OECD-DAC 2020). There are also voluntary sub-codes development partners can apply in reporting ODA for DRM, including 15116 (tax collection), 15155 (tax policy and administrative support, and 15156 (other non-tax revenue administration), however these additional codes are not consistently reported against by all development partners.

Findings

ODA flows for DRM from ATI development partners

In 2023, ATI development partners disbursed USD 281.1 million in gross ODA for DRM, an 18.5% decrease since 2022 and a 20.3% drop since 2020. This sharp decline has led to partners falling short of the target, reaching only 63.7% of the DRM ODA target. There are several reasons for the significant drop. These include the lingering effects of the COVID-19 pandemic. As highlighted in the 2020 Monitoring Report, the onset of the pandemic redirected resources toward immediate crisis response and created disruptions in programme delivery, and the effects have continued into 2023. For some development partners such as Germany, the consequences of the pandemic have continued to impact their DRM support strategy into 2023. Shifting donor priorities alongside increasingly constrained aid budgets are also likely to have contributed to the decline in ODA for DRM across the period 2020 – 2023. Although overall ODA grew between 2022 and 2023, it declined by 1% when measured at constant 2022 prices, reflecting growing pressure on aid budgets.[47] 2022 also brought a further shift in donor priorities, as the invasion of Ukraine prompted many donors to increase their financial and humanitarian support to Ukraine. In addition, there was a rise in in-donor refugee costs in 2022 and 2023, as countries responded to the influx of displaced populations, absorbing a larger share of overall aid budgets for some countries. These developments have reduced the availability of funds for priorities such as DRM and highlight the ongoing challenge of balancing immediate crisis response with long-term development goals.

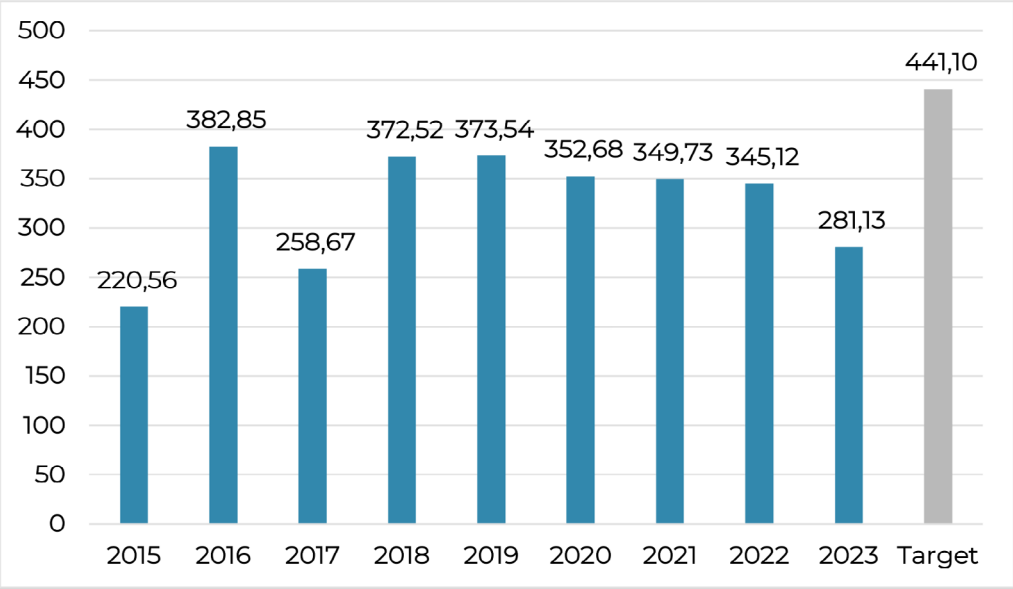


Figure 2.1 Overall flows of ODA for DRM from ATI development partners

Source: ATI DRM Database. Notes: Since 2020, the ATI only monitors disbursements; currency is USD millions; disbursements include both grants and loans.

[47] UN Trade and Development, "Aid at the crossroads: Trends in official development assistance", *https://unctad.org/publication/aid-crossroads-trends-official-development-assistance*.

As in 2021 and 2022, the three largest donors in 2023 continue to be the EU, Germany and Norway. However, disbursements in all three countries decreased from 2022 levels, despite consistent growth particularly in Germany, and the EU between 2020-22.

ODA disbursements in 2023 were below 2022 levels for 12[48] ATI development partners. Germany saw the most significant decrease in ODA for DRM between 2022 and 2023, by USD 49.2 million (from USD 96 million), followed by the EU (down by USD 16 million). The largest increase in ODA for DRM between 2022 and 2023 was in Denmark (up USD 6.9 million), followed by Switzerland and the Netherlands (both up USD 6.7 million).

Between 2021 and 2022, ODA for DRM increased in nine ATI development partner countries.[49] The largest increase in ODA was in the EU (by USD 21.6 million), followed by Germany (USD 15.1 million), while the largest decrease was in the United States (by USD 10.4 million), followed by France (USD 10.2 million).

Between 2020 and 2021, ODA for DRM increased in ten ATI development partner countries.[50] The largest increase in ODA was in Norway (up USD 12.3 million), followed by Germany (USD 11.1 million), while the largest decrease was in France (down USD 25.5 million), followed by Sweden (USD 11.4 million).

48 Australia, Canada, the EU, Finland, France, Germany, Ireland, Italy, Luxembourg, Norway, Slovakia, United Kingdom.

49 Germany, the EU, Finland, Ireland, Italy, Korea, Luxembourg, Slovenia, Sweden.

50 Australia, Canada, the EU, Germany, Luxembourg, the Netherlands, Norway, Slovakia, Switzerland, United States

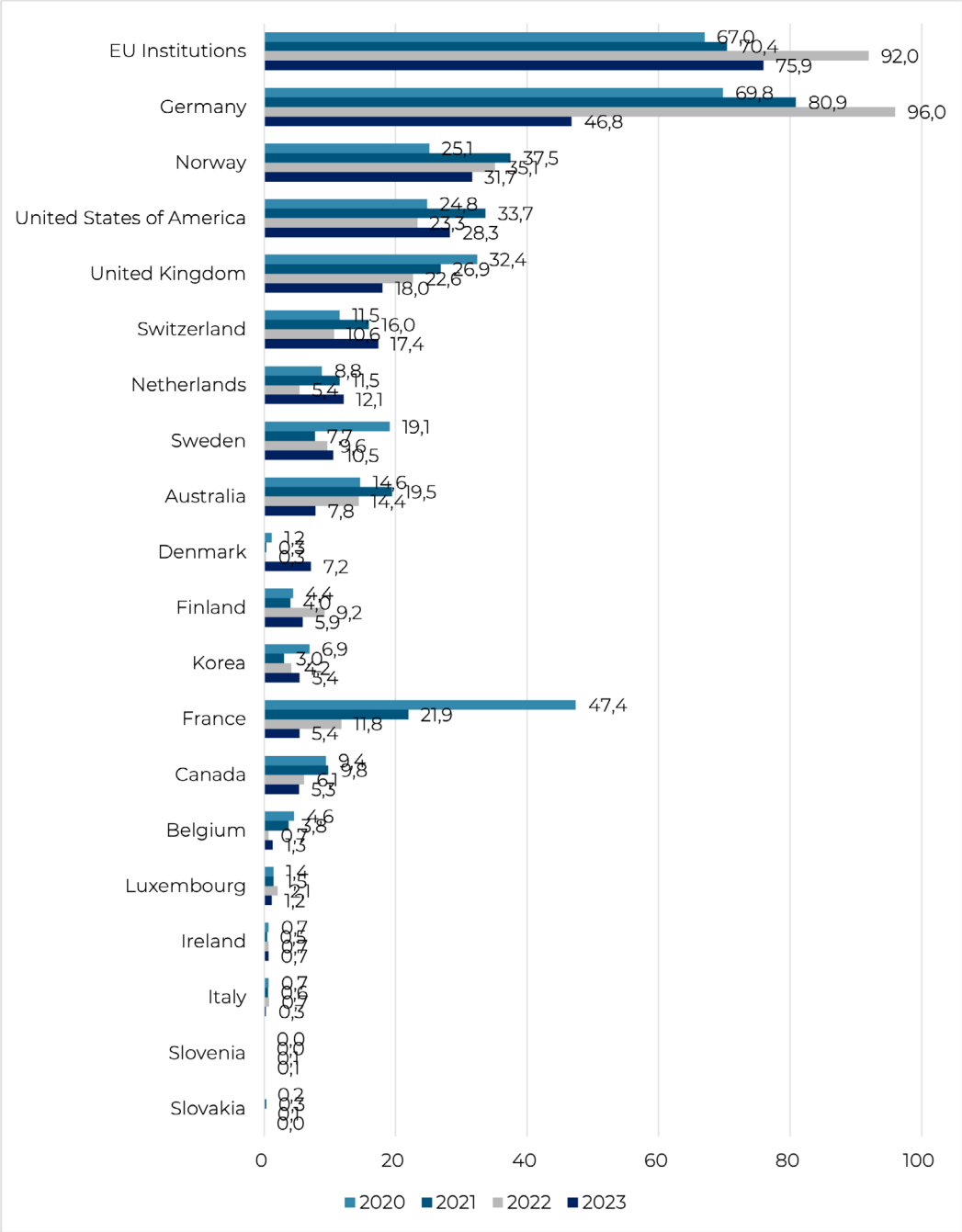


Figure 2.1 ATI development partners' support to DRM, 2020-2023

Source: ATI DRM Database

Note: gross disbursements in USD Millions; figures are displayed highest to lowest for 2023

Recipients of DRM support from ATI development partners

In 2023, 98 countries received ODA support for DRM from ATI development partners. Top recipients include Tanzania (USD 10.0 million), Ghana (USD 5.3 million), Indonesia (USD 5.1 million), all of which are ATI partner countries. The top ten recipients also include ATI partner countries Zambia (fifth largest recipient at USD 4.6 million, also top recipient in 2017 and 2022) and Benin (tenth largest recipient at USD 3.8 million, also top recipient in 2019).

In 2022, six of the top ten recipients were ATI partner countries, and eight were top recipients in 2021.

In 2022, Albania appeared in the top ten for the first time and remained a top recipient in 2023, while in 2023 Jordan was a top recipient for the first time since 2018. Of the top ten recipients, only Peru was new to the list in 2023, receiving USD 4.3 million.

Top Recipients (2023)		*Top Recipients (2022)*		*Top Recipients (2021)*	
Tanzania*	10.04	Indonesia*	48.50	Ghana*	17.84
Ghana*	5.25	Tunisia	24.01	Niger**	16.16
Indonesia*	5.05	Ukraine	9.28	Afghanistan**	11.11
Mozam-bique	4.77	Mozambique	6.67	Uganda*	9.90
Zambia*	4.57	Tanzania*	6.15	Ukraine	9.19
Albania	4.42	Ghana*	5.68	Mozambique	8.28
Peru	4.28	Uganda*	5.54	Cameroon*	8.19
Ukraine	4.26	Burkina Faso*	5.45	Tanzania*	7.50
Jordan	4.14	Albania	4.94	Tunisia	7.30
Benin*	3.84	Zambia*	4.82	Indonesia*	6.79

Table 2.1: Top 10 recipients of gross ODA disbursements (USD millions) for DRM from ATI development partners

Source: ATI database on ODA for DRM

* ATI partner country
** Suspended ATI partner country

Collectively, ATI partner countries received USD 80.1 million (28.5%) of total ODA for DRM in 2023, down from 34% in 2022 and 38% in 2021.[51] USD 71.9 million (25.6%) went to non-ATI partner countries in 2023, down from 35% in 2022 and similar to 2021 levels (25%). A further USD 30.4 million (11%) was earmarked for unspecified developing countries (down from 20% in 2022 and 19% in 2021), while the remaining USD 88.8 million (32%) was dispersed regionally without country specification, up from just 12% in both 2021 and 2022.

On average, ATI partner countries received 33.4% of ODA support for DRM between 2021-2023, while non-ATI partner countries received 28.4%. Regional allocations were on average 18.3% of ODA support between 2021-2023, while an average of 18.7% of ODA was allocated to unspecified developing countries.

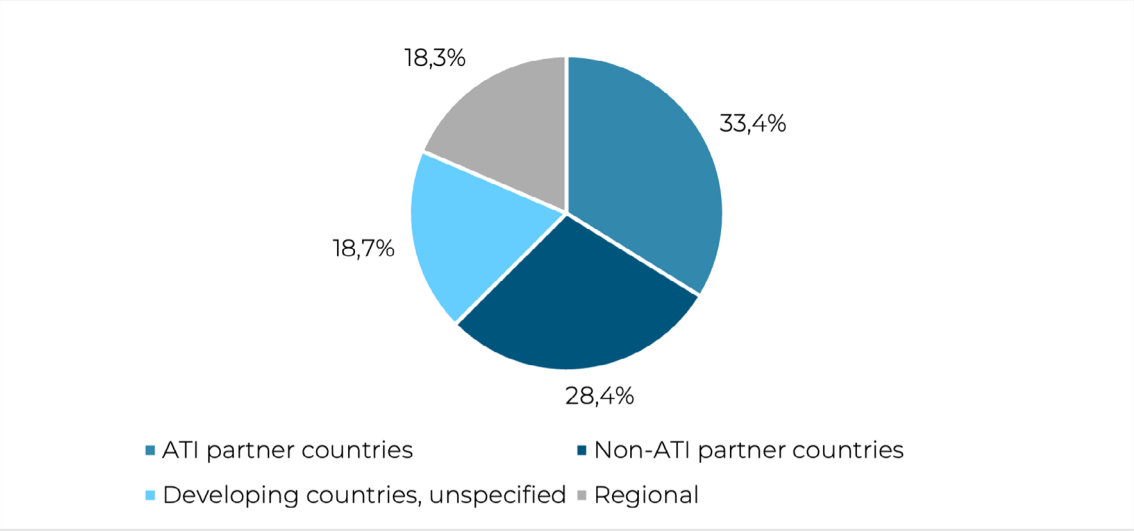
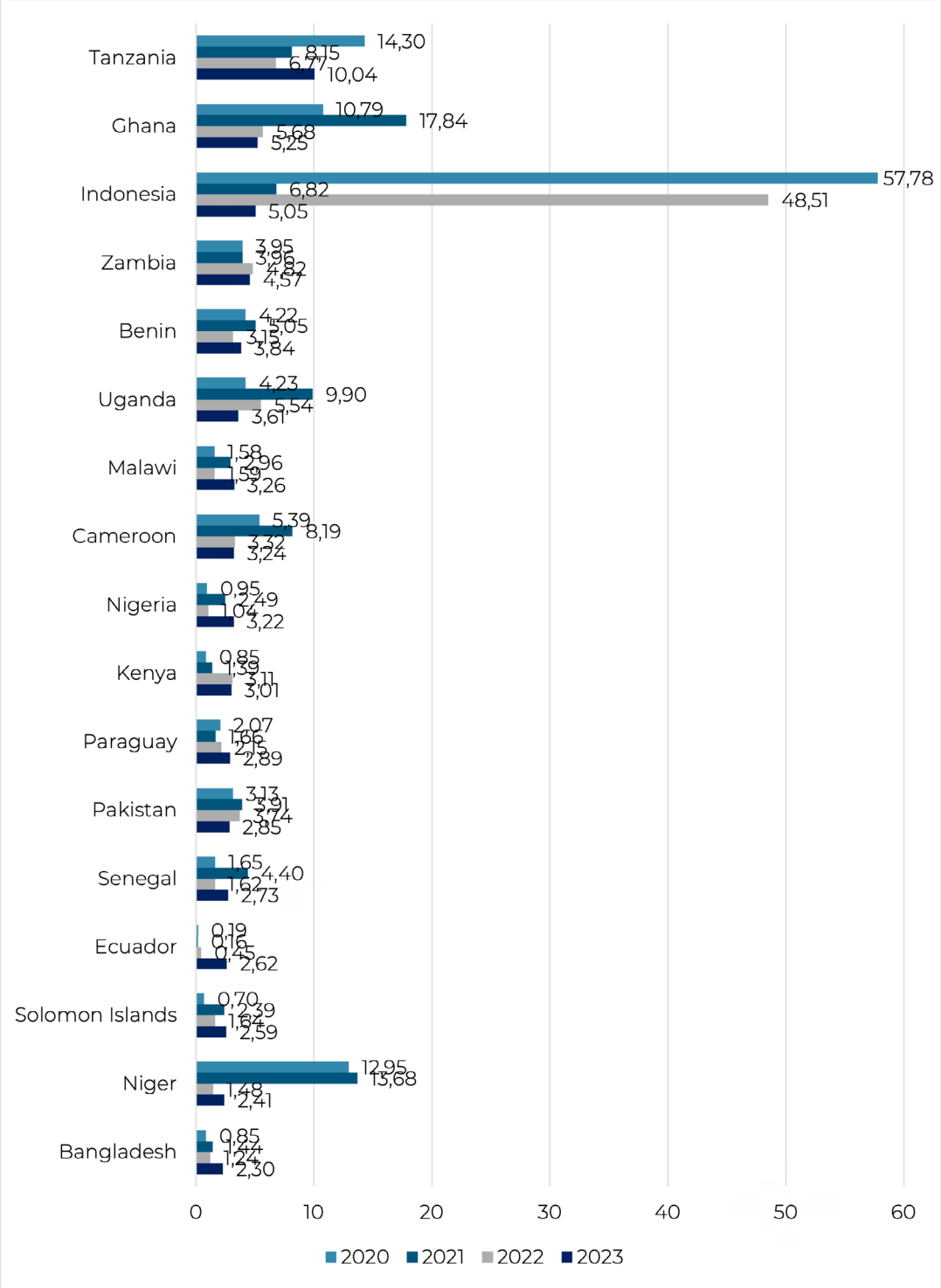


Figure 2.2 Average ODA support by recipient type (USD millions, 2021-2023)

Source: ATI database on ODA for DRM

ODA for DRM increased in 20 ATI partner countries from 2020 to 2021, in 11 partner countries in 2022 and in 18 partner countries in 2023. Between 2020 and 2021, Ghana experienced the largest increase (from USD 10.8 to USD 17.84 million), while the most significant reduction was in Indonesia (from USD 57.8 to USD 6.79 million). In 2022, Indonesia experienced the largest increase (rising to USD 48.5 million), while Niger registered the largest decrease (from USD 13.7 million to USD 1.5 million). Tanzania saw the largest increase in 2023 (USD 3.3 million) while the largest decrease was in Indonesia (USD 43.5 million). See **Annex 2.1** for further details on ODA support.

[51] Afghanistan did not receive ODA for DRM in 2023


Tanzania
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Indonesia
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Zambia
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Benin
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Uganda
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Malawi
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Cameroon
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Senegal
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Ecuador
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Solomon Islands
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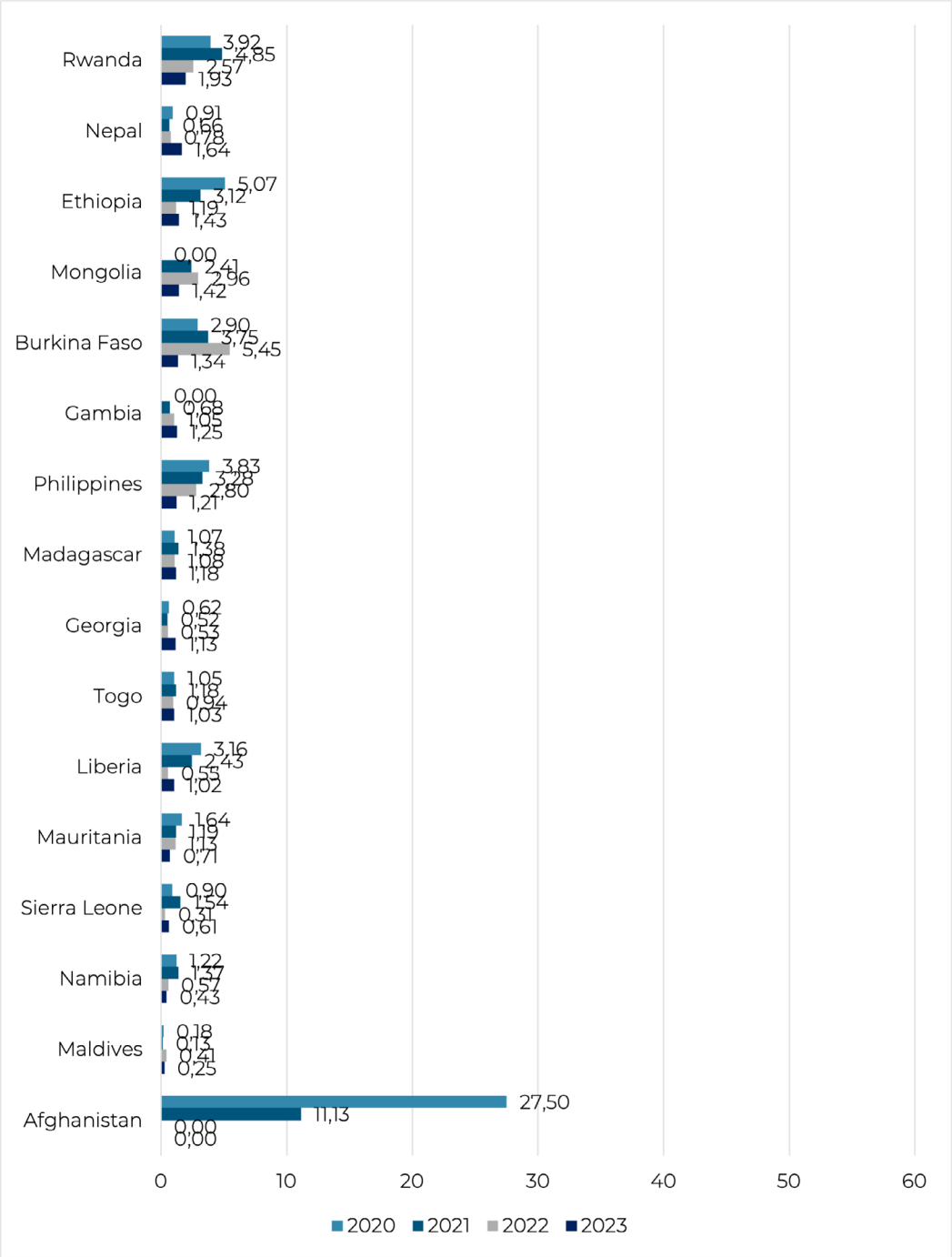

Figure 2.3 ODA support from ATI development partners to ATI partner countries (USD millions, 2020 – 2023)

Source: ATI database on ODA for DRM

Note: figures are displayed highest to lowest for 2023

Regions

In 2021, the South of Sahara region received the largest share of DRM support, totalling 36.6% of ODA (up from 29.4% in 2020), while projects with unspecified regional distributions comprised 25.6% of total disbursements.

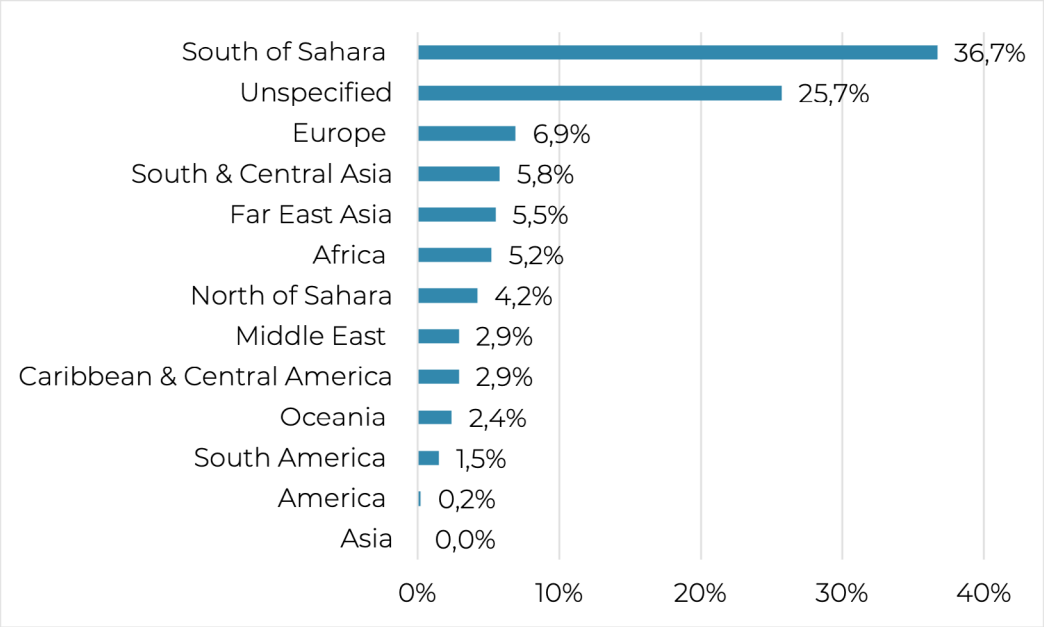

Figure 2.4 Regional distribution of ODA support (2021)

Source: ATI database on ODA for DRM

In 2022, the OECD DAC updated its regional reporting to include additional regions for Africa. This limits the comparability in regional spread between 2021 and 2023. The largest proportion of ODA were unspecified contributions, which accounted for 23.7% of DRM support. Far East Asia represented the second highest share at 18.7%, owing to the large increase in ODA to Indonesia.

In 2023, South of Sahara represents the largest regional share (21%), followed by Europe (7.9%), then Africa (6.9%). The largest decline was in Far East Asia, falling to 3.6% due to the sharp decrease in ODA to Indonesia. Unspecified developing countries continue to account for the largest proportion of DRM ODA, at 29.5% of total ODA support. Making up nearly a third of ODA contributions for DRM, the growing proportion of unspecified allocations may distort the regional distribution of ODA support.

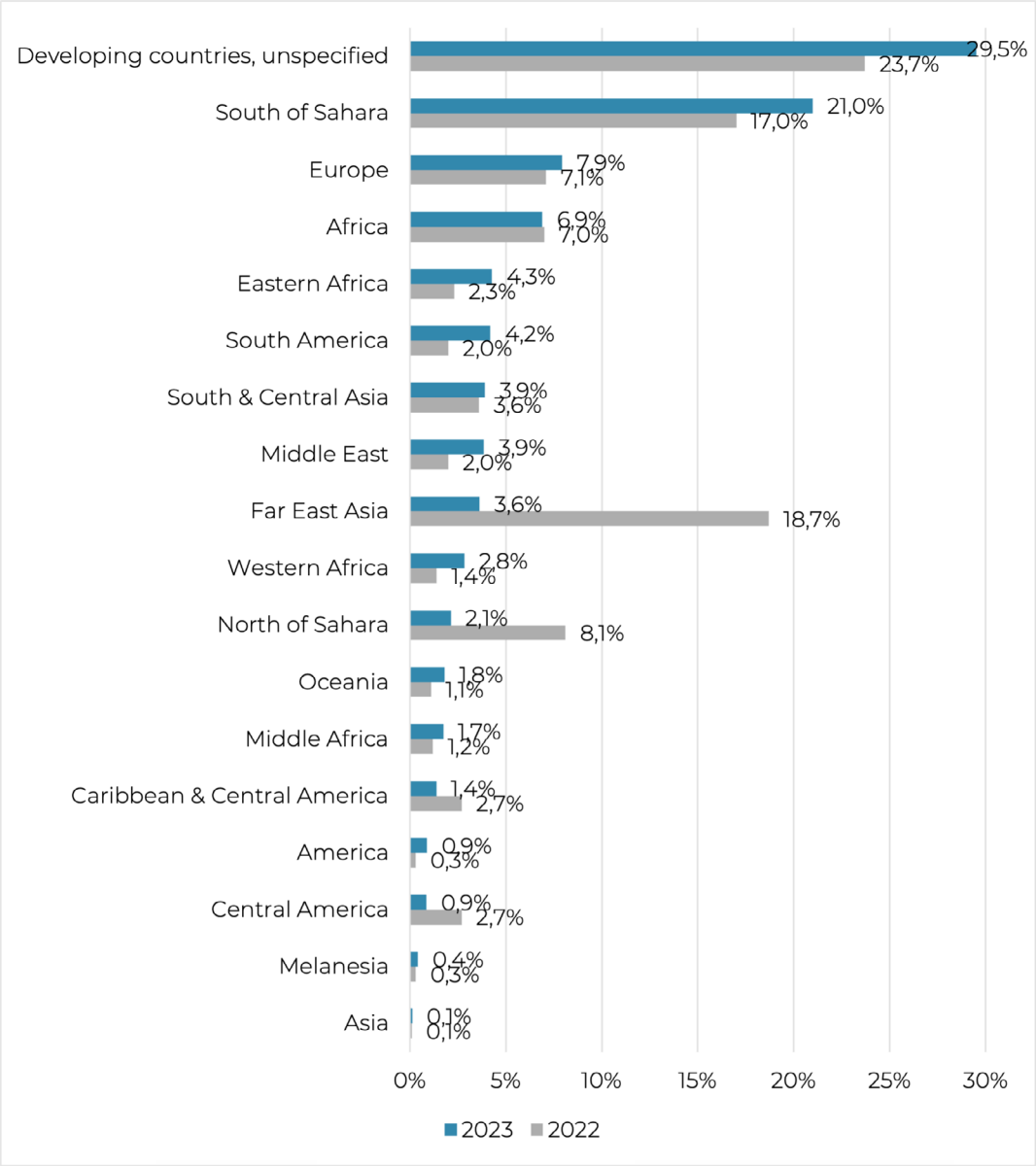

Figure 2.5 Regional distribution of ODA support (2022 – 2023)

Source: ATI database on ODA for DRM

Note: figures are displayed highest to lowest for 2023

Income groups

In 2021, least developed countries (LDCs) received roughly 32%, down from the 35% observed in 2020. While this figure decreased further to 18.3% in 2022, LDCs received nearly a quarter of DRM support (24.6%) in 2023. Upper middle-income countries (UMICs) received 15.4%, up from 11.5% in 2022 and 7.9% in 2021, while lower middle-income countries (LMICs) received 14%, down from 33.3% in 2022 and 23.2% in 2021.

In both 2021 and 2022, over a third of ODA support was disbursed without specification of an income group. In 2023, 43.2% of ODA support was disbursed without specification of an income group. As with regional distribution, the growing proportion of unspecified contributions may distort the analysis of recipients by income group.

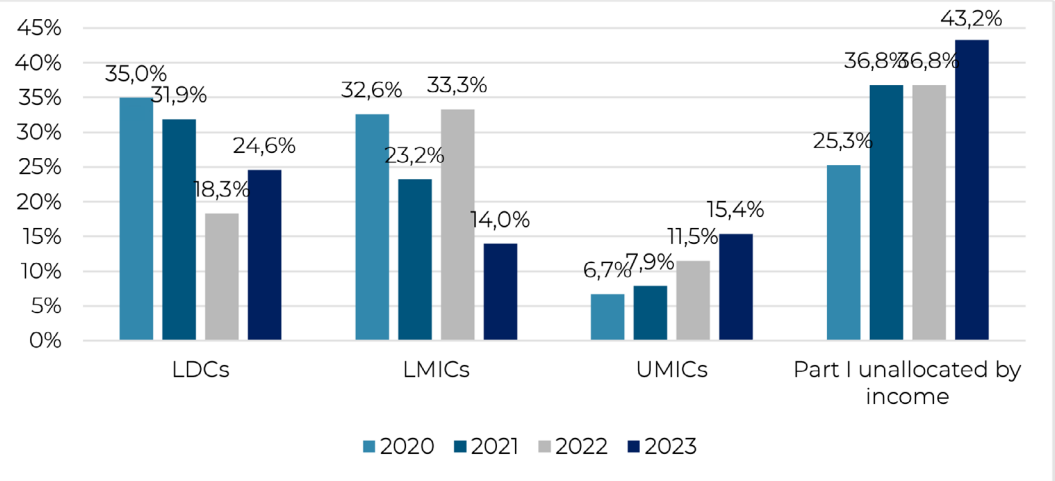

Figure 2.6 ODA distributed by income groups (2020 – 2023)

Source: ATI database on ODA for DRM

Channels and type of aid

Multilateral organisations continue to be the most common channel through which ATI development partners provide support, representing a quarter of ODA for DRM in 2023, up from 21% in 2022 and 25% in 2021. 19% of ODA support for DRM was channelled through central governments in 2023, up slightly from 18% in 2022 and 16% in 2021. The proportion of ODA directed through each channel remains largely the same between 2021 and 2023, apart from ODA channelled through recipient governments, which dropped from 15% of total ODA support in 2022 to 2% in 2023 (closer to 2020 and 2021 proportions).[52]

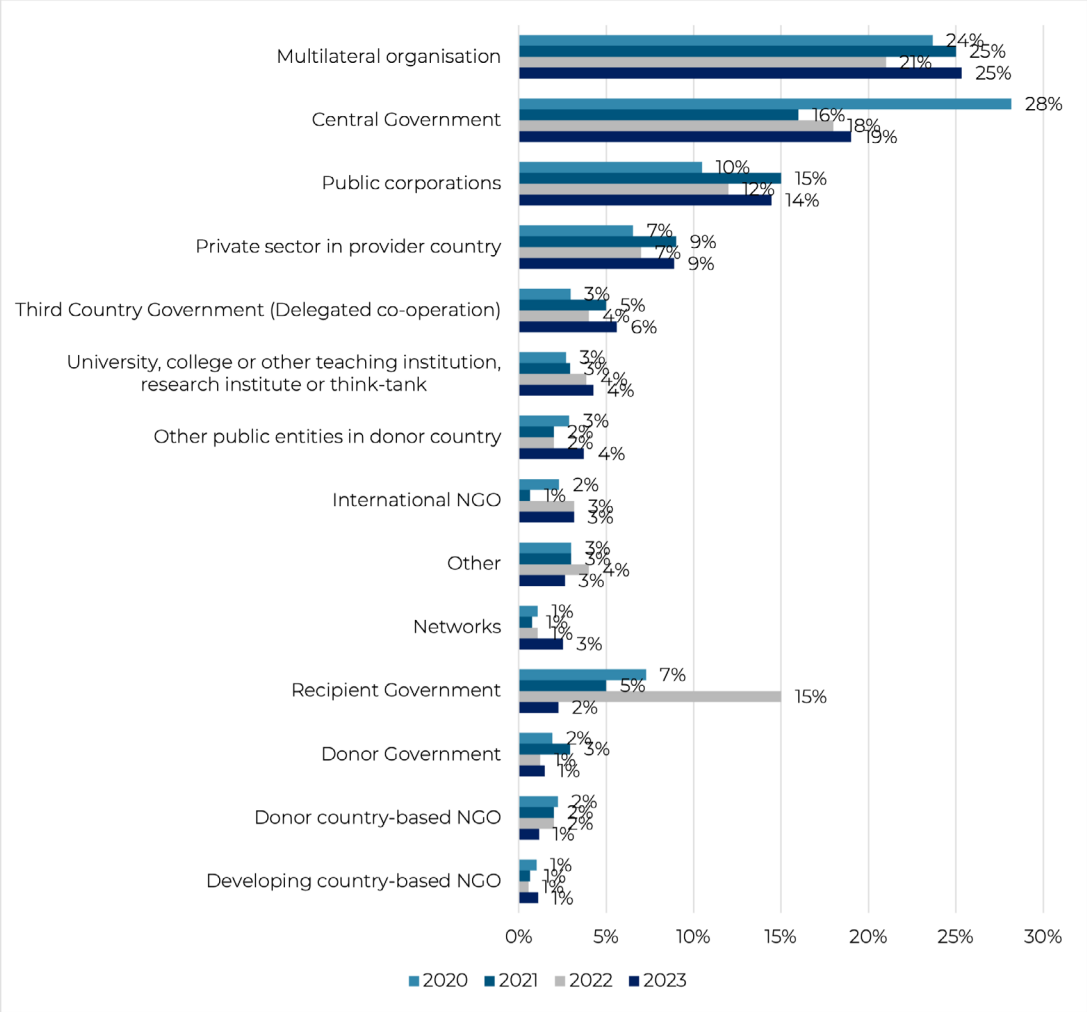

Figure 2.7 ODA distributed by channel (2020 – 2023)

Source: ATI database on ODA for DRM

Note: only channels with more than 1% in shares are shown for brevity; figures are displayed highest to lowest for 2023

[52] Central government refers to aid delivered directly to the central government of the recipient country, while recipient government is a broader category that includes central and local governments.

The majority of ODA support continues to be delivered through project-type interventions in 2023, increasing to nearly 60% from 53% in 2022 and 60% in 2021. Contributions to multi-donor/single-entity funding mechanisms accounted for 8.3% of ODA support in 2023 and was the second most important channel in 2023. While sector budget support played a more significant role in 2022 (22.7%), the proportion of ODA dropped to 7.8% in 2023, representing the third most important channel. Contributions to specific-purpose programmes and funds managed by implementing partners was the second most important channel in 2020, accounting for 19.3%. This proportion significantly decreased in 2021, 2022 and 2023, where it accounted for 7%.

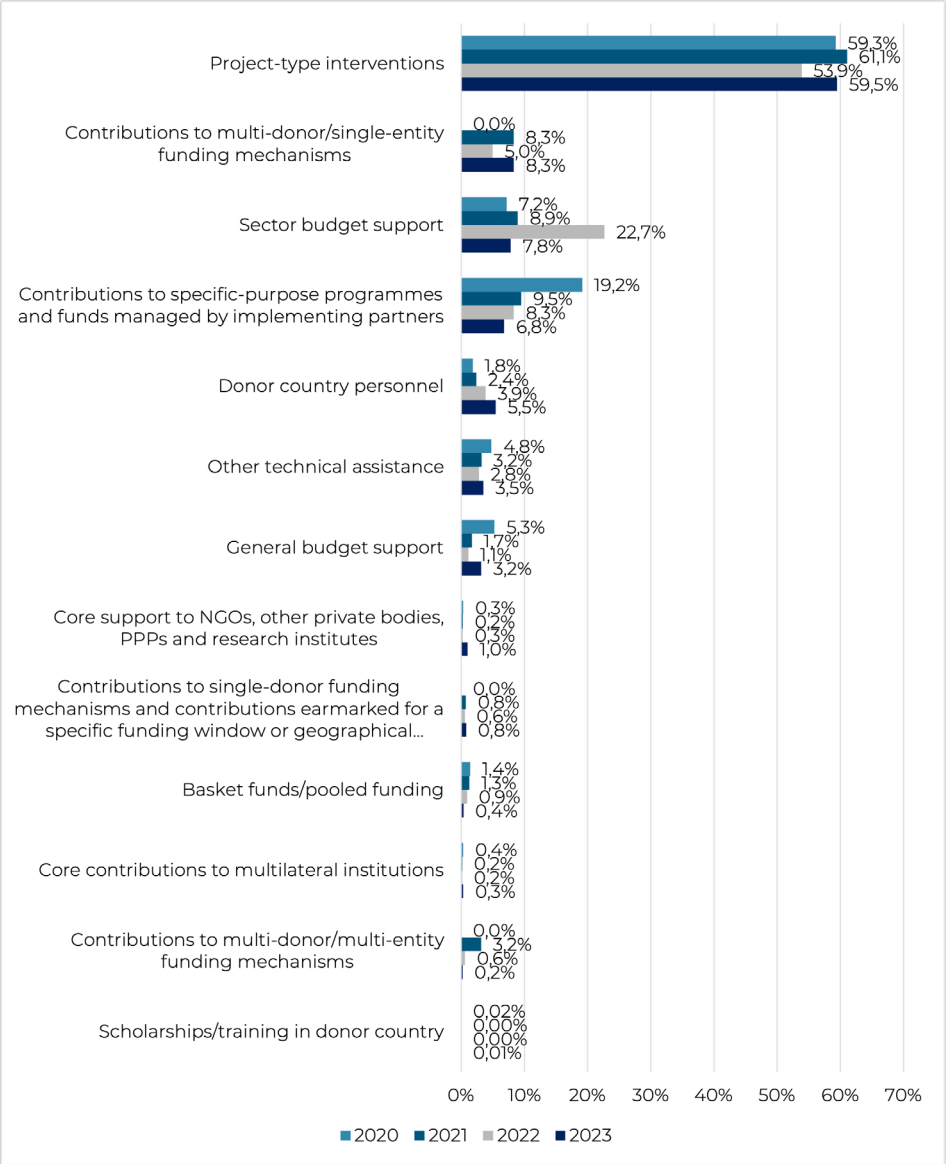

Figure 2.8 ODA distribution by aid type (2020 – 2023)

Source: ATI database on ODA for DRM

Note: figures are displayed highest to lowest for 2023

Country-owned tax reforms

The ATI Monitoring Survey includes a dedicated question on how ATI development partners support country ownership of tax reforms. 13[53] ATI development partners provided insights into their efforts to promote country-owned tax reforms in the 2023 monitoring survey responses. Responses indicate that development partners are increasingly aligning their support for DRM with the priorities, strategies and systems of partner countries.

A key principle shared by development partners is that DRM support should be demand-driven, anchored in national strategies and locally defined priorities. Some development partners initiate cooperation only upon formal request from partner governments, ensuring that their engagement directly responds to expressed national needs. For example, France's support to DRM programming is based on a formal request for assistance. Similarly, German cooperation begins with a proposal for support from partner governments and undergoes a detailed appraisal process in collaboration with local institutions to co-design projects that reflect shared objectives. Sweden and Ireland highlight the use of needs assessments to ensure that support is aligned to national priorities.

Some development partners prioritise using and strengthening local systems as part of their engagement model. The EU, for example, channels funds directly to national treasuries based on jointly agreed indicators on tax policy and administration. This model ensures alignment and encourages ownership by embedding reforms within national public financial management systems. Norway focuses its support on capacity building and technical assistance to ensure local institutions are equipped with the skills, knowledge and resources needed to sustain reform.

Stakeholder engagement and collaboration are also vital components of country ownership. Belgium, Ireland, France and Germany emphasise inclusive programme design processes involving political leaders, civil society, subnational governments and international partners. Regular consultations, steering committees and dialogue platforms serve as mechanisms to co-create and adjust reform programmes based on evolving needs.

Bilateral institutional partnerships play an effective role in reinforcing country ownership. ATI partner countries like Finland and the UK leverage the expertise of their domestic tax authorities to support peer institutions abroad, promoting a sense of mutual accountability. Finland's VERO agency, for example, is known for its grassroots-level approach, working directly with tax administrations to design support tailored to their operational context. In addition to working with a team of regional advisers to identify opportunities for capacity building support, the UK launched its Public Finance Resource Centre which provides technical assistance to partner countries on tax.

Finally, ATI development partners, including Denmark and France, stress the importance of monitoring and evaluation systems that measure impact using country-relevant metrics. This helps ensure that programmes remain response and accountable to partner country goals.

[53] Belgium, Denmark, the EU, Finland, France, Germany, Ireland, Italy, Norway, Slovak Republic, Sweden, Switzerland, UK.

Case study

Canada's KSPTA – Scaling virtual tax capacity building

Between 2021 and 2023, the Canada Revenue Agency (CRA) expanded its delivery of tax capacity building through the Knowledge Sharing Platform for Tax Administrations (KSPTA). Originally established as a collaborative online platform, KSPTA became a critical tool during the COVID-19 pandemic, helping overcome travel restrictions and the need for virtual engagement. As aid budgets tighten beyond 2023, it is important that ATI development partners explore how to maximise their support for DRM and tax reform in partner countries. Canada's experience with KSPTA demonstrates how digital platforms can effectively scale knowledge sharing and training, helping partner countries to sustainably strengthen DRM efforts even in the face of constrained resources.

As global demand for virtual training surged, KSPTA registrations grew to over 31,000 users with over 100,000 unique daily user logins. The versatile platform hosted 170 virtual and in-person events, attracting 13,200 participants from 219 jurisdictions. The uptake of eLearning was notable, with 17,900 course registrations, underscoring the shift towards hybrid and remote capacity development models.

KSPTA also strengthened international collaboration, hosting key global initiatives. For example, in 2023, the Pillars Knowledge Sharing Network was launched by HMRC under the Forum on Tax Administration, offering an interactive space for over 500 participants to exchange knowledge on the administrative dimensions of the Two Pillar Solution.[54] During this period, the Global forum, Tax Inspectors Without Borders (TIWB), and India joined the KSPTA as contributors, broadening the platform's expertise on DRM, governance, and combatting tax evasion and avoidance. KSPTA facilitated 24 Global Forum events and launched nine new eLearning modules on critical topics such as information security, while TIWB used the platform to engage experts and introduce targeted training.

As the ATI donor partners continue to seek innovative ways to strengthen their support for DRM, Canada's KSPTA offers a collaborative, scalable model for delivering tax capacity support, even amid fiscal and logistical constraints.

[54] OECD, "Statement on a Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy", 8 October, 2021, *https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/beps/statement-on-a-two-pillar-solution-to-address-the-tax-challenges-arising-from-the-digitalisation-of-the-economy-october-2021.pdf*.

Expert piece

Making aid-for-tax count

Giulia Mascagni & Martin Hearson
International Centre for Tax and Development (ICTD)

With aid in retreat, ATI's signature commitment to dedicate an increasing amount of ODA to strengthening countries' tax systems is more crucial than ever. Domestic revenue overtook aid as the largest source of development finance about two decades ago, but many lower-income countries are still mobilising 15 percent or less of GDP as tax revenue. Over the last decade, there has been significant learning on how to improve revenues and three lessons stand out:

The first is that, when governments are under huge pressure to increase tax revenue, they focus on short-term solutions that are not only ineffective in raising revenue, but also directly harmful to equity and growth. For example, when the financing gap widened during the Covid pandemic, many countries turned to the informal sector as the obvious place to expand the tax base. They adopted measures like mass registration campaigns and presumptive tax regimes. Both have a strong rationale in principle: getting everyone to pay their fair share, however little, and simplifying tax systems. However, research has shown that these measures generally produce little or no revenue. Even worse, they have serious unintended consequences: they tax businesses and earners who are below the poverty line, while increasing their costs of compliance. This has been detrimental to equity, growth and entrepreneurship. In a context of poor service delivery, it also undermines the social contract that underpins the whole tax mobilisation project.

There are some significant sources of revenue that can be raised equitably and quickly. Two that deserve particular attention are corporate tax exemptions and taxes on the wealthy. We now have better information than ever on the magnitude of tax exemptions – i.e., revenue that governments decide to forego with the aim to attract investment. Revenue foregone as a result amounted to about 30% of total revenue in low-income countries in 2023, or 2.4 percentage points of GDP.[55] Most exemptions are ineffective for attracting investment, and highly regressive.[56] Now is the time to dismantle them. Turning to taxes on the wealthy, an increasing body of research from the ICTD has also shown viable ways to do so more effectively using tax tools that already exist, like taxes on property, rental income, capital incomes, investment incomes, and income from self-employed professionals.[57] These are the most underperforming taxes in lower-income countries: as a share of GDP, higher income countries collect seven times more from taxes on property and three times as much from taxes on capital income.[58]

The third and perhaps most important lesson learned in the last decade of tax research is that to sustain any revenue gain, governments need to invest in the basics of tax administration in the medium term. A good example comes from digitalisation: digitised data and the introduction

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55 Data from the Global Tax Expenditures Databased, accessed on 9th June 2025 at *https://gted.taxexpenditures.org/data-visualisation/*

56 Bachas, Pierre Jean and Brockmeyer, Anne and Dom, Roel and Semelet, Camille, Effective Tax Rates, Firm Size and the Global Minimum Tax. Available at SSRN: https://ssrn.com/abstract=5036321 or http://dx.doi.org/10.2139/ssrn.5036321

57 Occhiali, G.; Mascagni, G.; Prichard, W. and Hearson, M. (2025) Taxing the Wealthy in Lower-Income Countries: Why It's Important, and How to Do It, ICTD Policy Brief 14, Brighton: Institute of Development Studies, DOI: 10.19088/ICTD.2025.007

58 Occhiali, G.; Mascagni, G.; Prichard, W. and Hearson, M. (2025) Taxing the Wealthy in Lower-Income Countries: Why It's Important, and How to Do It, ICTD Policy Brief 14, Brighton: Institute of Development Studies, DOI: 10.19088/ICTD.2025.007

of technologies such as electronic billing machines and digital IDs promises to have a transformational impact on tax administrations. In many ways, they already have transformed the way taxpaying works, making it largely digital in most countries. However, revenue generation has been slower to follow. The main reason is that technological advances need to be paired up with traditional enforcement efforts.

This, in turn, means increasing the number of staff working in tax administration, making sure they have the right skills to operate in increasingly digitalised tax administrations, so that digitised data does not just sit alongside manual processes but is fully integrated within core functions, and skilled officials can be redeployed towards high-return activities that often require interpersonal relations with taxpayers.

A tax official in a lower-income country typically deals with ten times as many taxpayers than her counterpart in higher-income countries.[59] Deploying that capacity strategically is a crucial remaining challenge which requires more attention.

[59] Okunogbe, Oyebola, and Gabriel Tourek. 2024. "How Can Lower-Income Countries Collect More Taxes? The Role of Technology, Tax Agents, and Politics." Journal of Economic Perspectives 38 (1): 81–106.

ATI Commitment 3

Introduction

Commitment 3 of the ATI focuses on members' efforts to adopt coherent and coordinated policies to foster Domestic Resource Mobilisation (DRM), including by combatting tax-related illicit financial flows. Ensuring policy coherence for DRM means developing an understanding of the relationship between national policies and DRM outcomes in partner countries, and making considered decisions on any trade-offs that emerge when policy choices come into tension with DRM efforts.

This chapter explores the efforts of 33 ATI partner countries and 20 ATI development partners to ensure coherent and coordinated policies that foster DRM. It begins by presenting the methodology, indicators, and data sources used. It then presents the findings, set against a baseline analysis for continued monitoring for the remainder of the ATI Declaration 2025.

Methodology

Monitoring of the efforts and results of ATI members on policy coherence draws on a variety of sources, including publicly available data and self-reporting through the 2023 ATI Monitoring Survey.

Under Commitment 3, the obligation on development partners is to ensure that their tax systems do not hamper efforts to raise domestic revenues in partner countries by introducing measures to minimise abusive tax practices and harmful tax incentives. Some of these practices are set out in the Inclusive Framework on Base Erosion and Profit Sharing (BEPS) minimum standards. These include efforts to eliminate harmful tax practices and treaty shopping, efforts to increase country-by-country reporting (CBCR), and implementing mutual agreement procedures. This chapter takes into account any measures taken in these areas, together with the *Corporate Tax Haven Index* which measures the scope for tax abuse allowed by a country's tax and financial system.[60] It also reflects development partners' use of spillover analysis to assess the impact of their tax practices on partner countries' ability to raise domestic revenues, as reported in the 2023 ATI Monitoring Survey.[61]

Commitment 3 requires ATI partner countries to ensure that their tax expenditures are transparent and do not disproportionately impact on their DRM efforts. Transparency is assessed by reference to the amount of data published by national governments and visible in the *Global Tax Expenditures Database* (GTED),[62] including annual reporting of tax expenditures. It also takes account of data collected through the 2023 Open Budget Survey, which asks partner country governments to present information on tax expenditures, and information from the 2023 Monitoring Survey on parliamentary scrutiny and inter-agency cooperation on tax expenditure decisions.[63]

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60 The Monitoring Framework includes data on indicators 1, 5, 6, 10 and 11. A score of 0 means there is no scope for tax abuse, while a score of 100 indicates unrestrained scope for tax abuse.

61 15 ATI Development Partners submitted surveys, including Belgium, Canada, Denmark, the EU, Finland, France, Germany, Ireland, Italy, the Netherlands, Norway, Slovak Republic, Sweden, Switzerland and the UK.

62 The GTED collates publicly available data on tax expenditure published by governments.

63 16 ATI partner countries returned survey responses.

Finally, the monitoring process assesses the efforts of member countries to address illicit financial flows (IFFs). Indicators include data from the OECD hosted *Global Forum on Transparency and Exchange of Information for Tax Purposes* on Automatic Exchange of Information (AEoI) and Exchange of Information on Request (EoIR) for Tax Purposes. It also takes account of data on beneficial ownership registers and bearer shares, collected by the *Tax Justice Network*.

A complete list of the indicators used throughout this chapter can be found in the *ATI Declaration 2025 Monitoring Framework*.

Findings

Coherent and coordinated policies of ATI development partners

Harmful tax practices: number of recommendations addressed across ATI development partners

Base Erosion and Profit Sharing (BEPS) Action 5 seeks to counter harmful tax practices by enhancing transparency in the exchange of information on taxpayer-specific rulings. This is one of the four BEPS minimum standards that is subject to peer review.

In 2020, the peer review on harmful tax practices made recommendations for three ATI development partners: Switzerland (two), France (one), and the Netherlands (one).

By the 2022 peer review, Switzerland had addressed one of these recommendations: to strengthen and make more efficient its information gathering process by identifying all past rulings within the scope of the transparency framework, as well as improving its review and supervision mechanisms. This recommendation has been fully implemented since 2020-21. However, the second recommendation, on ensuring that all information on past and future rulings is exchanged, remains outstanding from 2019.

By the time of the 2021 peer review, France had addressed its outstanding recommendation to identify and exchange information on new entrants to the intellectual property regime, and on taxpayers benefitting from the third category of intellectual property assets. This recommendation had been outstanding since 2016.

By the 2022 peer review, the Netherlands had addressed the 2020 recommendation to ensure that information is made available to the competent authority without undue delay.

With 75% of recommendations (3 of 4) addressed by 2023, the ATI partners have made considerable progress in reducing harmful tax practices identified by the BEPS Action 5 peer review. Only one recommendation remains outstanding for Switzerland to address.

Treaty shopping

BEPS Action 6 addresses treaty shopping and abuse, and is another one of the four BEPS minimum standards. It stipulates that members of the BEPS Inclusive Framework must address treaty shopping in their tax treaties.

The 2020 OECD peer review highlighted significant efforts made to address treaty shopping, particularly by countries that ratified the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI). The number of agreements covered by the MLI increased by nearly 500%. The MLI has been the main tool for implementing the min-

imum standard on treaty shopping. Of 19[64] ATI development partners, 18 have been signatories to the MLI since 2017. The United States is the sole exception. As of 2023, the MLI has entered into force in all ATI development partner signatories except Italy.[65]

The percentage of ATI development partner tax treaties judged as compliant with the minimum standard is shown in **Table 1 (see annex 3.1**), along with any concerns raised about implementation. Based on annual peer reviews in 2021 and 2022, the number of compliant agreements has continued to rise, increasing by approximately 30% between 2021 and 2022 and by another 30% between 2022 and 2023. The number of compliant tax agreements has increased from 373 compliant agreements (22.9%) in 2020 to 746 (45.4%) in 2023.

Ireland had the highest share of compliant tax agreements in 2023, increasing from 54.8% in 2021 to 74.3% to 2023. This is followed by Luxembourg (55.4% in 2021 to 73.8% in 2023) and South Korea (43.6% in 2021 to 60.6% in 2023).

While no countries experienced a decline in the proportion of compliant agreements, the 2021 and 2023 Peer Review Reports on Treaty Shopping note that none of the United States' tax agreements are compliant with the minimum standards.[66] The United States is the only ATI development partner country that is yet to sign or ratify the MLI. It has 65 current tax agreements in force. In the 2020 peer review, the United States indicated that it intended to implement a detailed Limitation on Benefits (LOB) rule as part of its commitment to implement the minimum standard in all bilateral agreements. However, details on the LOB are not available through the MLI and require bilateral discussions and modifications to each treaty. The United States' agreements with 45 jurisdictions contain an LOB rule and are supplemented by domestic anti-conduit rules.[67] However they are not reported as compliant with the minimum standard.

Country-by-country reporting

The Country-by-Country Multilateral Competent Authority Agreement (CbC MCAA) sets procedures for jurisdictions implementing BEPS Action 13 on the automatic exchange of CbC Reports on an annual basis. Apart from the United States, all ATI development partner countries are signatories to the CbC MCAA, having signed in 2016.

There are 115 activated bilateral exchange relationships under the CbC MCAA among ATI development partner countries, up from 35 reported in the 2020 ATI Monitoring Report. The 2020 Monitoring Report showed a lack of diversity in activated bilateral exchange relationships, being limited to Indonesia and Pakistan. By 2023, however, seven ATI partner countries had activated bilateral exchange relationships: Indonesia (18), Nigeria (18), Pakistan (17), the Maldives (17), Georgia (15), Kenya (15), and Liberia (15). While still a small number of jurisdictions, this is a notable improvement.

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64 This excludes the EU, as individual countries are signatories.

65 *Signatories and Parties to the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting*, OECD, updated 24 September 2024 (*link*).

66 The 2020 Monitoring Report reported that 45 of the United States' tax treaties were compliant with the minimum standards, as the Third Peer Review Report on Treaty Shopping detailed that the US would comply with the minimum standard by implementing a detailed limitation on benefits (LOB) rule through its bilateral agreements and in turn satisfy the minimum standard. The US had 45 agreements with the LOB, and this figure was reported as compliant in the 2020 Monitoring Report. In the Fourth and Sixth Peer Review Reports on Treaty Shopping, the OECD clarified that none of the US's agreement comply with the minimum standard, as the LOB is not available through the MLI and requires substantial bilateral discussions and modifications to each treaty.

67 Anti-conduit regulations identify factors that determine whether an intermediate entity, through which income is channelled, may be used for tax-avoidance.

Mutual agreement procedures

Action 14 of the BEPS Minimum Standard aims to improve the resolution of cross-border tax disputes through the incorporation of Mutual Agreement Procedure (MAP) provisions into tax treaties. The Stage 2[68] peer review reports made recommendations for certain development partners to improve their dispute resolution mechanisms. Four ATI development partners were peer reviewed in 2021 and subject to recommendations (following six peer reviews in 2019 and nine in 2020). While no further development partners were peer reviewed in 2022 or 2023, many are making efforts to ensure their tax treaties are fully compliant with BEPS Action 14. For example, development partners are amending protocols to bring their treaties into line with the minimum standards, as well as boosting administrative compliance capacities. **Table 2 in Annex 3.2** details specific developments related to MAP in tax treaty networks.

Harmful tax practices: corporate tax haven indicators

The Corporate Tax Haven Index (CTHI) measures the scope for tax abuse allowed by a country's tax and financial system, where a score of 0 means no scope while a score of 100 means unrestrained scope. Countries often make special tax arrangements for multinational corporations, which can result in them paying less tax on profits than statutory corporate income tax rates. As the CTHI notes, this can trigger a global race to decrease tax rates.[69]

Indicator 1 identifies the lowest available corporate income tax (LACIT) for any large for-profit company that is tax resident in a country. The indicator assesses legal gaps and negative spillovers that can result from lower tax rates. Country scores indicate a wide range, with Italy obtaining the lowest score (24) and Ireland the highest (100). Scores across the ATI development partners remain largely the same since 2020. However, scores for Slovenia and UK decreased by nine points and 17 points respectively (indicating improvements in eliminating scope for tax abuse), while France's score increased by seven points to 26. These changes in scores are due to increases in corporate income tax rates in Slovenia (from 19% to 22%) and the UK (from 19% to 25%) since the 2021 CTHI, and a decrease in the corporate income tax rate in France (from 33.3% in 2017 to 25.83% in 2022). Changes in ATI development partner scores are illustrated in **Figure 1** below.

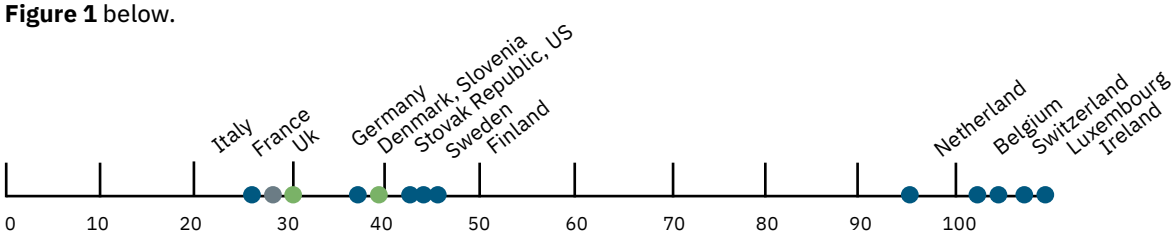

Figure 1: Country scores, CTHI Indicator 1

68 The peer review process involves two stages. The first stage involves a review of a country's implementation of the minimum standard based on its legal framework for MAP, and application in practice. Stage 2 reviews measures taken by the country to address any issues raised during the Stage 1 peer review. ATI development partners underwent Stage 2 peer reviews between 2019 and 2021.

69 Included in this section are updates for CTHI Indicators 1, 5 and 10. The 2020-25 ATI Monitoring Framework also includes CTHI indicator 11, which assesses whether countries ensure their own access to country-by-country reporting of relevant foreign multinational enterprises with domestic operations. Since the 2020 Monitoring Report was published however, the CTHI's methodology changed and information related to this indicator is no longer being reported. It is therefore not included in the 2023 Monitoring Report.

Indicator 5 measures the availability of broad exemptions from corporate income tax. There is the potential for abuse of tax breaks given to corporations operating in specific sectors to shift profit and underpay taxes owed in other jurisdictions. Sweden has the lowest score of 13, while Ireland and the Netherlands share the highest score of 81. Scores remain unchanged for all ATI development partners since the 2021 CTHI, see Figure 2 below.

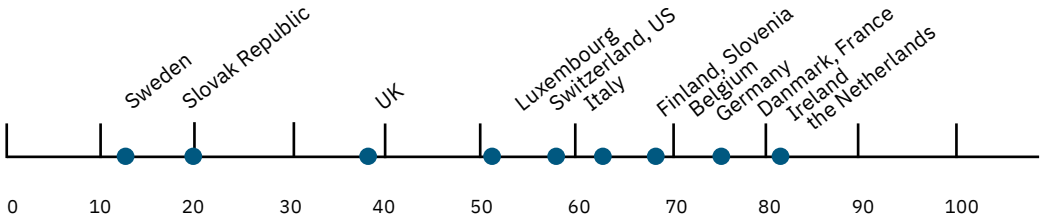

Figure 2: ATI Development Partner scores, CTHI Indicator 5

Indicator 6 measures if and to what extent time-bound or locationally confined tax incentives are available in a country, measuring if the incentives offer partial or full exemptions from corporate income tax and/or capital gains tax. Scores across this indicator remain unchanged since the 2021 CTHI. Belgium, Denmark, Finland, Germany, Ireland, Italy, the Netherlands, Slovakia, Slovenia, Sweden and Switzerland all have a low score of 0, while France has the highest score at 100. Luxembourg, the UK and the US have a score of 13.

Indicator 10 measures whether companies listed on stock exchanges, involved in certain sectors or incorporated in a given jurisdiction are obligated to publish globally available financial reporting data on a country-by-country reporting (CbCR) basis. Corporations can shift profits to tax havens, conceal information and underpay taxes when countries do not require corporations to report on their assets for each country where they are affiliated. While most scores remain unchanged,[70] Switzerland saw a 15-point increase and the US saw a 10-point decrease since 2020, now both scoring 90. Switzerland's score is based on their most comprehensive form of CbCR, which is publicly available, although it only applies to the extractive and forestry sectors. The CTHI notes that Swiss legislation requires companies to report information to a low standard of reporting, as companies are required to make thematic disclosures that exclude basic financial and tax information. The United States has one type of public CbCR, applying to resource extraction. The CTHI also indicates low standards of reporting, as some basic financial and tax information is excluded from reporting obligations.

Spillover analysis

As of 2023, no additional ATI development partners have undertaken a formal spillover analysis of their tax systems. Denmark, the Netherlands and Ireland remain the only development partners to have conducted spillover analysis.

The Netherlands completed a comprehensive spillover analysis in 2021 aimed at evaluating the unintended effects of its tax system on developing countries. Conducted as part of a broader evaluation by the Ministry of Foreign Affairs, the study covered the period from 2012 to 2020. It

[70] 13 countries maintained their score of 50: Belgium, Denmark, Finland, France, Germany, Ireland, Italy, Luxembourg, the Netherlands, Slovakia, Slovenia, Sweden and UK.

examined how features of the Dutch tax regime might enable profit shifting and treaty shopping. The findings informed a formal government response in 2021 which emphasised improving policy coherence for development and addressing harmful tax practices.

Denmark previously conducted a spillover analysis, reported in its 2021 Voluntary National Review, while Ireland conducted a spillover analysis in 2015. Ireland's 2022 Tax Treaty Policy reaffirms its commitment to perform spillover analyses before entering into treaty negotiations with least developed countries and has since taken additional legislative actions in line with international standards, including BEPS and EU anti-tax avoidance directives.

Finland has not conducted a formal spillover analysis, but carried out a broader evaluation focused on DRM. Similarly, France has not conducted a dedicated spillover analysis, however spillover effects have been addressed in its international tax policy engagements, including through the OECD/G20 Inclusive Framework on BEPS and multilateral platforms such as the Platform for Collaboration on Tax.

Coherent and coordinated policies of ATI partner countries

Tax expenditure transparency and parliamentary scrutiny

Partner country governments frequently offer preferential tax treatment to foreign corporations, such as tax exemptions, deferrals, deductions, credits, and reductions, in order to boost foreign investment. Tax revenues foregone through these preferential measures are referred to as tax expenditures. In order to balance revenue-raising goals with other policy objectives, it is important that tax expenditures are applied in a measured and evidenced way. Adequate transparency is key to enabling scrutiny and accountability for their use.

Since the 2020 monitoring exercise, five ATI partner countries started reporting on tax expenditure: Bangladesh, Georgia, Ghana, Togo and Zambia. Kenya and Uganda improved the frequency of reporting to 'regular',[71] having previously only published just one tax expenditure report. As noted in the 2021/22 Monitoring Brief, Tanzania also improved its reporting frequency from irregular to regular. Paraguay now reports just overall estimates, having previously reported provision-level data,[72] but improved the frequency of its reporting from irregular to regular. Mauritania also now reports overall estimates, having previously reported disaggregated data. Benin improved its reporting by providing provision-level data. **Table 3 in Annex 3.3** for more information on tax expenditure transparency.

The Global Tax Expenditures Transparency Index (GTETI) tracks indicators related to the regularity, quality and scope of tax expenditure globally, providing a systematic framework by which to rank countries. Indonesia overtakes Benin with the highest GTETI rank among ATI partner countries (respectively ranked second and ninth globally). Ecuador continues to be ranked 13th globally, followed by Georgia (21st) and Pakistan (24th). By contrast, nine countries continue to be

[71] The GTED differentiates between 'regular' and 'irregular' reporting in their database. 'Regular' reporting constitutes consistent reporting generated over a steady period of time, up to the present time. 'Regular' reporting does not necessarily need to be published on an annual basis. For example, data reported every two years over a consistent period of time would still be considered 'regular' under the GTED methodology.

[72] Provision-level data refers to when a country reports data at the individual tax expenditure provision-level.

ranked at the lowest score (106),[73] with a further five countries ranked below 90.[74] See **Table 4 in Annex 3.4** for additional detail on the GTETI indicators.

Based on the Open Budget Survey 2023, four countries have improved parliamentary scrutiny of their tax expenditures since the 2020 Monitoring Report. Georgia now presents its parliament with information beyond the core elements on all tax expenditures, while Mongolia provides core information for all tax expenditures. Liberia and Paraguay also improved their transparency and now present some information on expenditures. Burkina Faso and Ghana have both received lowered scores than in the past Monitoring Report, having failed to present any information related to tax expenditure. Ghana disputed this result; however, it was upheld by the OBS upon review of Ghana's FY2022 budget statement, since tax expenditure information was not presented. In Burkina Faso, information on spending is not presented in the executive's proposed budget document. While reports on tax expenditures for the budget year are prepared and annexed to the executive's draft budget, these are not currently published on the Ministry of Finance's website.

Inter-agency coordination and parliamentary scrutiny of tax expenditure

16 of the 33[75] ATI partner countries responded to the 2023 ATI Monitoring Survey. All survey respondents indicated that they had a designated ministry or entity responsible for fiscal policy, leading the process of granting and monitoring tax expenditures. The GTETI identified 23 partner countries in which tax expenditure reporting is assigned to a specific government ministry or agency.

15[76] of the ATI partner country responses indicated that tax legislation is heavily scrutinised by relevant government departments, undergoing rigorous review by their respective parliaments to ensure that existing and new tax expenditures are provided for in their tax legislation.

Of the 16 survey responses, three[77] were from partner countries that had not previously returned surveys as part of the 2020 Monitoring Report, and a further four[78] were from new ATI partner countries that joined the ATI in 2022 and 2023. With these additional survey responses, alongside historical survey data, the increase in country coordination and parliamentary scrutiny of tax expenditure is promising.

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73 Afghanistan, Bangladesh, Ghana, Malawi, Namibia, Nepal, Solomon Islands, the Gambia and Zambia.

74 Mongolia (90), Maldives (91), Paraguay (92), Madagascar (101) and Tanzania (105).

75 Bangladesh, Ecuador, Georgia, Ghana, Indonesia, Kenya, Liberia, Madagascar, Maldives, Niger, Pakistan, Philippines, Rwanda, Sierra Leone, the Gambia and Zambia.

76 Ecuador did not provide a relevant answer to this survey question.

77 Ghana, Indonesia and Pakistan.

78 Bangladesh, Ecuador, Maldives and Zambia.

Combatting tax-related illicit financial flows

Addressing illicit financial flows (IFFs) is critical to increase the potential for DRM, as these outflows constrain the availability of finance for investment and negatively impact efforts to raise public revenue in partner countries. International efforts to address IFFs have evolved over time and include indicators developed by the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes. These indicators focus on Automatic Exchange of Information (AEoI) and the Exchange of Information on Request (EoIR) for Tax Purposes. The ATI Monitoring Framework also utilises data on beneficial ownership to assess efforts aimed at combating IFFs.

Automatic Exchange of Information (AEoI)

AEoI refers to the cross-border sharing of information by tax administrations, including information related to financial accounts held by individuals, corporations, trusts, etc. The purpose of these agreements is to help stop tax avoidance and evasion. While there are multiple agreements related to AEoI, the ATI Monitoring Framework tracks adherence to the Common Report Standard (CRS), developed by the OECD. Exchange of information under the CRS is achieved by requiring local country financial institutions to provide information on account holders with tax authorities in relevant foreign jurisdictions.

As with the previous ATI Monitoring Report, 18 of the 19 ATI development partners are signatories to the CRS Multilateral Competent Authority Agreement (CRS MCAA) for the implementation of AEoI on financial accounts.[79] All 18 ATI development partner signatories provide information on activated AEoI relationships under the CRS MCAA.

The number of activated AEoI relationships across all development partners has increased since the 2020 Monitoring Report, indicating enhanced efforts to tackle tax avoidance and evasion. On average, each development partner has 65 activated AEoI relationships under the CRS MCAA, up from an average of approximately 56 in 2020.

By 2023, 11 out of 33 partner countries were signatories to the CRS MCAA.[80] This constitutes a substantial increase from the last monitoring exercise when there were only six. The number of activated AEoI relationships has also increased across the eight ATI partner country signatories that provide this information.[81] These improvements again indicate enhanced efforts by ATI partner countries to address tax evasion and avoidance.

Data on the number of activated AEoI relationships for both development partners and partner countries can be found in **Annex 3.5, Table 5**.

Exchange of Information on Request (EoIR)

EoIR refers to the process by which tax administrations exchange information upon specific request, typically in cases of tax investigations. Under EoIR, authorities can request detailed information about financial accounts, business interests, and other relevant financial data related to individuals, corporations, or trusts. This approach is used to support tax compliance and combat tax evasion by providing information when there is a justifiable reason or suspicion of tax-related misconduct. The Amended Multilateral Convention on Mutual Administrative Assistance in Tax

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79 The US is not a signatory and the EU is excluded from this dataset as only individual countries are signatories.

80 ATI partner signatories are Georgia, Ghana, Indonesia, Kenya, Liberia, Pakistan, Rwanda, Uganda, Ecuador, Maldives and Nigeria.

81 Georgia, Ghana, Indonesia, Kenya, Pakistan, Ecuador, Maldives and Nigeria.

Matters is in force in 18 of the 19 ATI development partners.[82] The amended convention is also in force in 19[83] ATI partner countries, up from 14 in the previous monitoring exercise, and is signed by a further two.[84] The amended convention was brought into force in Rwanda and Maldives in 2022, and in Burkina Faso and Benin in 2023.

In 2023, five ATI member countries[85] (only development partners) are 'compliant' in their overall rating of EoIR requirements, while 24 ranked 'largely compliant' and two ranked 'partially compliant'.

Slovenia held a 'compliant' score in the last monitoring exercise. However, after a second round of peer review in 2022, its compliance scores decreased. Slovenia's scores decreased from compliant to largely compliant for indicators on the availability of information as it relates to (A1) ownership and identity information and (A3) banking information.

Additional information on individual indicator rankings can be found in **Table 6 of annex 3.6**.

Beneficial ownership registers and bearer shares

Compiled by the Tax Justice Network, the Financial Secrecy Index measures the extent of financial secrecy permitted by a country's laws. With wide reaching implications, financial secrecy can be used to facilitate tax abuse and money laundering. As such, the overall Secrecy Score considers 20 indicators, scoring countries between 0 (indicating no secrecy) and 100 (indicating full secrecy). The ATI Monitoring Framework includes four of these indicators to assess how countries approach beneficial ownership transparency and bearer shares. Indicators 3, 4, 5, and 6 are concerned with identifying and registering beneficial owners, or those who control or receive profits from a company or legal vehicle, with the aim of increasing transparency and discouraging illicit financial behaviours. For more detailed information on these indicators, refer to the *Tax Justice Network website*.

As referenced in the 2021-22 ATI Monitoring Brief, and shown in **Table 7 of Annex 3.7** the performance of ATI development partners remains mixed. The latest 2022 data shows 13 instances where development partners scored a lower figure in the selected indicators compared to 2020, and 13 instances where scores increased. Conversely, ATI partner countries generally performed better: seven cases indicated lower secrecy indicators compared to 2020, while only three showed higher indicators.

In terms of bearer shares, there were two cases among development partners (Slovak Republic and Belgium) where bearer shares were unavailable in 2020 but were available as of 2022, indicating a move towards greater financial secrecy. In contrast, ATI partner countries demonstrated improvement, with Kenya and Tanzania reporting no bearer shares available or circulating.

Overall, the trend of financial secrecy appears mixed among ATI development partners, while there seems to be a movement towards less secrecy in ATI partner countries, particularly among those for which data is available (16 out of 33).

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82 It is signed by the United States but not in force.

83 Benin, Burkina Faso, Cameroon, Ecuador, Georgia, Ghana, Indonesia, Kenya, Liberia, Maldives, Mauritania, Mongolia, Namibia, Nigeria, Pakistan, Paraguay, Rwanda, Senegal and Uganda.

84 Madagascar and Togo.

85 France, Ireland, Italy, Norway and Sweden.

Case Study

Tax expenditure reporting in Georgia

Since 2020, Georgia has taken important steps to improve tax expenditure transparency and reporting. These efforts signal its commitment to fostering accountability and aligning its tax systems to its broader development strategies.

In 2020, Georgia launched a comprehensive assessment of its tax expenditures to enhance transparency and strengthen fiscal policy decision-making. It led to the publication of the country's first Tax Expenditure Report (TER) in 2022. The TER represents a milestone in public financial management, showcasing a comprehensive process including defining a benchmark tax systems and compiling a tax expenditure inventory (*link*).

Led by the Ministry of Finance, three main taxes were analysed: value-added tax (VAT), personal income tax (PIT), and profit taxes, including both distributed profit tax (DPT) and corporate income tax (CIT). Using the 'revenue foregone' method, the TER measures the fiscal costs of tax expenditures, offering policymakers key insights into foregone government revenues.

Georgia also initiated a tax expenditure evaluation (TEE) to assess the effectiveness of tax expenditures in achieving their intended objectives and their alignment to growth and development strategies. The government is prioritising the evaluation of tax expenditures based on fiscal cost, contribution to employment, and overlap with other government programmes, with the aim of evaluating all key tax expenditures (*link*).

With the publication of the TER in 2022, Georgia is one of four ATI partner countries that began reporting on tax expenditures since the 2020 ATI Monitoring Report. It currently ranks 36th in the Global Tax Expenditures Transparency Index (GTETI), and is the eighth-highest among ATI partner countries. Moreover, Georgia has a legal requirement to include the TER as an annex to its annual budget, ensuring that tax expenditure reporting is a core component of fiscal planning and decision-making. These transparency efforts have also boosted Georgia's scores in the 2023 Open Budget Survey, particularly in enhancing parliamentary scrutiny of tax expenditures.

Expert piece

Domestic Revenue Mobilisation in the Age of Sovereign Debt Distress

Max Gallien and Martin Hearson
International Centre for Tax and Development (ICTD)

Over the past few years, Ghana, Sri Lanka, Lebanon and Zambia have defaulted on external debt, while many other countries are facing high and rising debt servicing costs.[86] One difference between the current wave of debt distress and previous ones is the prominent place of taxation in conversations about the way forward. The feasibility and desirability of urgently ramping up tax revenues in times of debt distress has become a central question for the domestic resource mobilisation (DRM) agenda.

While expanding DRM has been highlighted as a key pillar of efforts to tackle liquidity challenges faced by countries with high debt service costs, tax mobilisation as a share of GDP has stagnated in many lower-income countries in recent years. This underlines the difficulties countries face to keep mobilising more tax revenue, as well as the importance of more international support in these efforts.

But high debt servicing costs also create barriers to expanding taxation. Today, 3.3 billion people live in countries that spend more on debt servicing than on health or education.[87] High debt has also given rise to questions about accountability and transparency in public finance. Gaining sufficient public consent for increased taxation in such contexts is a challenge, as the government of Kenya discovered in 2024.

Maintaining liquidity in the face of sovereign debt distress also risks shifting the time horizon of tax policy and administration, prioritising short-term increases in revenue over reforms that may build more capacity in the long-term. Substantially expanding DRM is at the very least a medium-term project, and such incentives can be actively counterproductive.[88] For example, unpopular taxes introduced at short notice can undermine public acceptance in the tax system as a whole, and may have greater negative impacts on equity and growth.[89]

For countries that are in acute debt distress, these dynamics take on an additional urgency, but they are also connected more directly to negotiations with creditors. Public support can be further complicated if tax measures are understood to be tied to conditionality.

Navigating the interface between tax and debt requires thinking about three interconnected dynamics, the first of which is time. There are, with no doubt, substantial opportunities to expand tax capacity,[90] but sustainable progress is incremental. Without a realistic and pragmatic approach to the pace of change, perverse incentives may create negative impacts now, as well as undermining longer-term DRM efforts.[91] An overestimation of what tax can do in the short term

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86 Ceyla Pazarbasioglu and Pablo Saavedra, 'Now Is the Time to Help Countries Faced with Liquidity Challenges'

87 UNCTAD, 'A World of Debt: A Growing Burden to Global Prosperity'.

88 Max Gallien, Adrienne Lees, and Giulia Mascagni, 'Getting Targets Right: How Much Revenue Can Lower-Income Countries Raise?' (Institute of Development Studies, 11 March 2024), https://doi.org/10.19088/ICTD.2024.016.

89 Hearson, M., et al. (2024) Taxing Mobile Money in Africa: Risk and Reward, ICTD Policy Brief 10, Brighton: Institute of Development Studies DOI: 10.19088/ICTD.2024.071

90 Juan Carlos Benitez et al., Building Tax Capacity in Developing Countries, Staff Discussion Notes (Washington, D.C: International Monetary Fund, 2023), https://doi.org/10.5089/9798400246098.006.

91 Gallien, Lees, and Mascagni, 'Getting Targets Right'.

also risks delaying crucial conversations on debt restructuring and forgiveness.

This leads to the second point: the relationship between tax and debt brings equity considerations into sharp focus, within and between countries. The scale of fiscal adjustments under consideration makes it impossible to think of these processes as purely technical or marginal. They need to be understood within wider conversations around distributional justice: that is, after all, how they will inevitably be understood by populations and electorates.

Finally, just as it is important to think politically about equity within the tax system, the same logic applies to its relationship with the environment. Public conversations about debt are already infused with 'climate justice' considerations, converging in the language of sustainability that echoes between them. In questioning whether it is meaningfully sustainable for lower-income countries to devote high proportions of their domestic tax revenue to debt servicing, it is important to consider their exposure to the effects of climate change, and the fiscal burden this creates, too.

Commitment 4

Introduction

Commitment 4 of the Addis Tax Initiative (ATI) commits ATI members to enhance space and capacity for accountability stakeholders in partner countries to engage in tax and revenue matters. Under the 2020-25 monitoring framework, accountability is defined by transparency, engagement and capacity. Accountability is assessed through the efforts of governments to provide publicly available information on tax issues as well as opportunities to engage with non-state stakeholders (e.g., civil society, academia, media) when coordinating decision making processes on taxes. It also includes stakeholders' ability to participate and engage with government on taxes.

Greater accountability can help create more equitable tax policies that are aligned with public needs. When governments openly engage with their taxpayers and provide transparent information on tax matters, citizens are better equipped to understand how tax policies are made, who benefits from them, and where tax revenues are allocated. Incorporating citizens' voices on tax matters brings diverse perspectives on policy implications and helps to generate more balanced and responsive tax policies. Enhancing transparency around tax matters and stakeholders' ability to engage in tax policy dialogue builds public trust in tax systems and can improve tax compliance. It can also highlight inefficiencies in the tax systems and increase the accountability of tax authorities and policymakers to the public.

Methodology

The ATI monitoring framework assesses data across the following three accountability indicators:

Indicators on transparency: ATI monitors the efforts of partner countries to publish accessible explanations of their tax strategy (including goals, rationale for tax policies and approach to tax administration) and core tax data (including tax revenues raised and forecast, tax expenditure and the tax gap). The analysis presented is based on the ATI's assessment of published tax strategies, data from the Global Tax Expenditures Database (GTED) and assessments of tax transparency carried out by the International Budget Partnership (IBP) through the Open Budget Survey (OBS).

Indicators on engagement: ATI monitors partner country performance in opening up tax processes for engagement from accountability actors, such as civil society, media, and academia. The analysis is based on ATI member responses to the Monitoring Survey and insights from the IBP's OBS.

Indicators on capacity: ATI monitors the level of Official Development Assistance (ODA) for domestic resource mobilisation (DRM) and the extent to which this support includes accountability and the participation of non-state actors. The analysis is informed by the ATI DRM database (drawn from the OECD-DAC data on DRM-related ODA flows), and the responses of ATI partner countries to the Monitoring Survey.

Transparency of taxes

As part of the fourth ATI commitment, ATI partner countries agree to improve transparency of tax strategies, revenues, and expenditures. By assessing the clarity and accessibility of tax revenue information, this indicator aims to ensure that citizens are informed about how their taxes are collected and used. Transparency in tax revenue management is essential for fostering public confidence in a government's ability to allocate resources effectively and equitably. Clearly outlining ministerial tax policy goals not only improves public knowledge of tax systems, but it can also contribute to improved tax compliance. Transparency around tax revenue can also encourage governments to adopt best practices in fiscal reporting, which can contribute to more effective tax systems, clearer policy objectives, improved public service delivery, and sustainable development.

Transparency on tax strategies

As part of the commitment to improve transparency around taxes, the ATI Monitoring Report assesses the availability and content of ATI partner country tax strategies. In addition to the existence of a strategy, the report presents analysis on whether strategies include:

1. Tax policy goals
2. Rationale for tax base decisions
3. Details on tax expenditure issues
4. The government's approach to tax administration

In 2023, 22 ATI partner countries published tax/revenue strategies, double the number reported in the 2020 Monitoring Report. Of the 22 countries with accessible strategies, 20 outlined specific tax policy goals, 15 provided explanations for the tax base and rates, 10 addressed tax expenditure issues, and 13 gave information on tax administration approaches.

Table 4.1 presents details on individual countries' tax strategies. Ten of the 22 countries with published tax strategies were also included in the 2020 Monitoring Report (denoted with a *).[92]

ATI partner countries	*Goals of the strategy*	*Rationale for tax base*	*Address tax expenditure issues*	*Tax administration approach*
Afghanistan*	No	Yes	No	No
Cameroon	Yes	No	No	No
Ecuador	Yes	Yes	Yes	Yes
Ethiopia	Yes	Yes	Yes	No
Georgia*	Yes	No	No	Yes
Ghana	Yes	Yes	Yes	Yes

[92] While Liberia was included in the 2020 Monitoring Report, it is not included for this reporting period as its Corporate Strategy Plan expired in FY 2020/21 and has been replaced by an Interim Plan covering the calendar year 2022, however it does not provide details on revenue strategy. A new Corporate Strategic Plan (2024-28) is in development.

Kenya*	Yes	Yes	Yes	Yes
Madagascar	Yes	Yes	No	Yes
Malawi	Yes	Yes	Yes	Yes
Mauritania	No	Yes	No	No
Namibia*	Yes	Yes	Yes	No
Nepal*	Yes	Yes	Yes	Yes
Nigeria	Yes	Yes	Yes	No
Pakistan*	Yes	Yes	No	No
Philippines*	Yes	No	No	Yes
Rwanda	Yes	Yes	No	Yes
Sierra Leone	Yes	Yes	Yes	Yes
Solomon Islands	Yes	No	No	No
Tanzania*	Yes	No	No	Yes
The Gambia*	Yes	No	No	No
Uganda*	Yes	Yes	Yes	Yes
Zambia	Yes	No	No	Yes

Table 4.1 Assessment of the tax/revenue strategies of ATI partner countries in 2023

Source: Websites of relevant government ministries and revenue authorities

Scores in four ATI partner countries changed since 2020. Kenya's strategy now includes details on strategic goals, tax base rationale, and tax expenditure issues. Nepal's strategy includes details on tax base rationale and tax expenditure issues. Namibia's strategy includes details on tax base rationale and tax expenditure issues but does not discuss tax administration. The Gambia's strategy no longer includes details on tax expenditure issues or tax administration.

The overall increase in published strategies alone is a notable accomplishment among ATI partner countries. The proportion of strategies that include tax policy goals has increased to 90.9% in 2023, up from 81.8% in 2020 (**see Table 4.1**). The proportion of strategies that include a rationale for the tax base increased to 68.2% in 2023, up from 36.4% in 2020. 45.5% of strategies in 2023 include details on tax expenditure, up from 27.3% in 2020. Only the proportion of strategies that include details on tax administration is lower in 2023 than it was in 2020, at 59.1% (down from 81.8%). However, the absolute number of strategies that include a tax administration approach is higher than in 2020 (13 compared to 9). There is very tangible progression among ATI partner countries to improve transparency around their tax strategies across these key indicators.

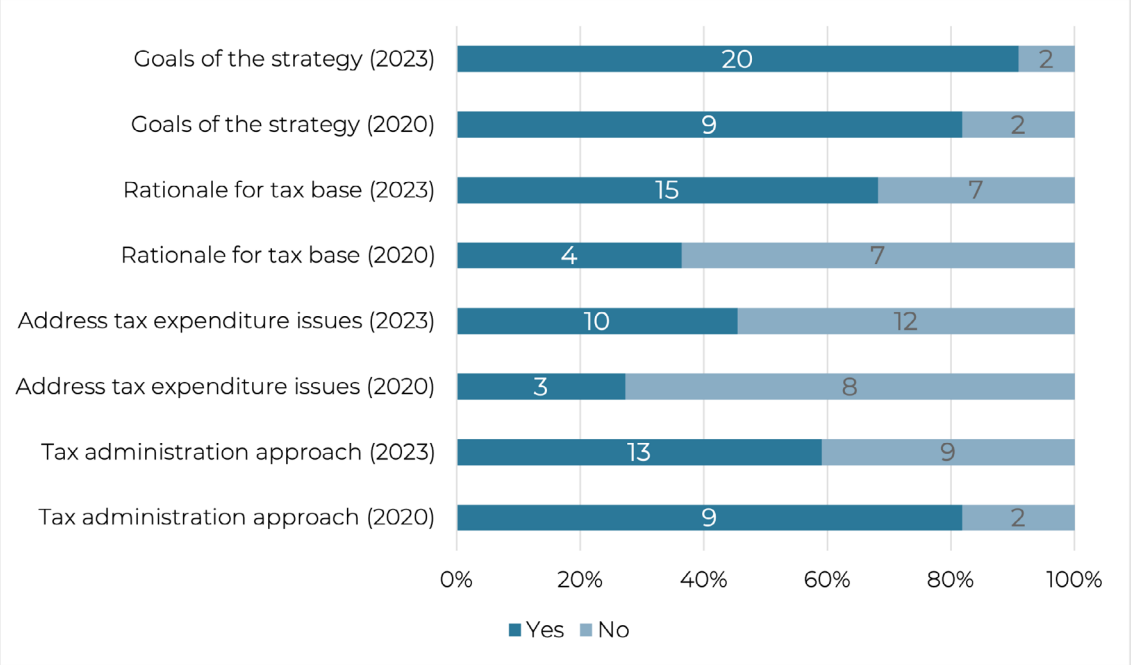

Figure 4.1 Assessment of ATI partner country tax/revenue strategies, 2020 and 2023

Transparency on tax revenues raised

In addition to tax strategies, the ATI monitoring process also assesses the transparency of tax revenue reporting in ATI partner countries, particularly whether information is reported by tax type, taxpayer, sector of the economy, and gender. Data on tax revenues were found for 31 ATI partner countries,[93] and identified that:

- 27 ATI partner countries[94] reported on taxes raised across individual tax types, compared to 22 in 2020.
- One ATI partner country[95] provided details on taxes raised by taxpayer, compared to none in 2020.
- Two ATI partner countries[96] provided details on aggregate taxes raised by income bands, compared to none in 2020.
- Eight ATI partner countries[97] reported taxes raised across sectors of their economies, with an additional 2[98] providing details for some sectors, such as oil and aviation. In 2020, 10 ATI

[93] Information on tax revenue was not found for Paraguay, and it was not possible to access and fully check the relevant government webpages for Mongolia.

[94] Government publications detailing tax revenues raised by tax types were not identified for Afghanistan, Benin or Ethiopia. Additionally, this information could only be identified through OECD data for Burkina Faso, Georgia, Madagascar, Niger and Solomon Islands.

[95] Rwanda.

[96] Afghanistan for the year 2021 and Cameroon.

[97] Cameroon, Ghana, Liberia, Nigeria, Pakistan, the Philippines, Rwanda, and Zambia.

[98] Kenya and the Gambia.

partner countries[99] also reported taxes raised across sectors, however the composition of reporting countries has changed.

- One ATI partner country[100] published information disaggregated by gender, compared to none in 2020.

While there has been some progress towards improved transparency of tax revenue reporting from baseline figures in 2020, only slight gains have been made across the 33 ATI partner countries, particularly across reporting by taxpayer, sector of the economy, and gender disaggregated data. Continued efforts from ATI partner countries remain essential over the course of 2023-2025 to improve transparency of revenue reporting.

Transparency on tax revenue forecasts

The ATI monitoring framework includes indicators on transparency of tax revenue forecasts, using data generated by the IBP OBS. The OBS includes questions on i) whether Executive budget proposals, or any supporting budget documentation, presents individual sources of tax revenue (such as income tax or VAT) for the budget year, and ii) whether Executive budget proposals, or any supporting budget documentation, presents revenue estimates by category (such as tax and non-tax) for a multi-year period (at least two years beyond the budget year). The 2023 OBS provides data on 30 ATI partner countries,[101] identifying which countries fully, partially, or fail to publish data on tax revenue forecasts in their Executive budget proposals.

Does the Executive's budget proposal or any supporting budget documentation present the individual sources of tax revenue (such as income tax or VAT) for the budget year?

76.7% of ATI partners (23 of 30) scored 100, having published individual sources of tax revenue, accounting for all tax revenue, up from 64% in the 2021 OBS survey. 10% (3 of 30) scored 67, having presented information on individual sources for at least two-thirds of tax revenues, down from 18% in 2021. 3.3% (1 of 30) scored 33, having presented information on individual sources of tax revenue accounting for less than two-thirds of all tax revenues, up from 0% in 2021. Finally, 10% (3 of 30) scored 0, indicating they did not publish individual sources of tax revenue, down from 18% in 2021.

5 ATI partner countries' OBS scores improved in 2023. Madagascar experienced the largest jump in score, to 100 in 2023 from 0 in 2021. In 2021, the OBS noted that individual sources for tax revenue were not presented and tax revenue forecasts were not detailed. In 2023, individual sources for all tax revenues were presented, meriting a full score of 100. Liberia also scored 100 in the 2023 OBS, up from 33 in 2021. In 2023, all revenue sources were reported, earning a score of 100, compared to less than two-thirds in 2021. Additionally, Ecuador and Zambia scored 100 in the 2023 OBS, both up from 67 in 2021, and Tanzania scored 33, up from 0.

1 ATI partner country's OBS scores decreased in 2023. Afghanistan score decreased to 0 from 100 in the 2021 OBS survey.

Does the Executive's budget proposal or any supporting budget documentation present revenue estimates by category (such as tax and non-tax) for a multi-year period (at least two-years beyond the budget year)?

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99 The Gambia, Kenya, Liberia, Namibia, Nepal, Niger, Pakistan, the Philippines, Tanzania, Uganda and Zambia.

100 Tanzania.

101 The OBS does not report data for Maldives, Mauritania and Solomon Islands.

In 2023, 63.3% of ATI partner countries (19 of 30) provided multi-year estimates of revenues by category, down slightly from 64% in 2021. 36.7% of ATI partner countries (11 of 30) did not provide multi-year estimates of revenue by category in 2023.

Two ATI partner countries[102] began publishing multi-year estimates by category between 2021 and 2023, while Four ATI partner countries stopped publishing multi-year estimates by category.[103]

In 2023, 18 ATI partner countries published full information in budget proposals on both individual sources of tax revenue and estimates by category (up from 13 in 2021).[104] Three ATI partner countries did not publish any of this information in Executive budget proposals.[105] Of the three that did not publish any information in their budget proposals, only Ethiopia failed to do so in both 2021 and 2023.

Transparency on tax expenditures

As discussed under Commitment 3, transparency on tax expenditures is critical to ensure accountability, public trust, and fair policy implementation. In addition to transparency around tax exemption policies, accessible information on revenues forgone as a result of tax exemptions promote the scrutiny of, and accountability for, their use. This ultimately contributes to more equitable tax systems.

Included in the IBP OBS is a question on whether core information on tax expenditures is included in Executive's budget proposals. Core information must include a statement of purpose or policy rationale for each tax expenditure, the intended beneficiaries, and an estimate of the revenue foregone. In 2023, the OBP's findings remain largely the same at the aggregate level, with 16 of 30 ATI partner countries not presenting information related to tax expenditure (compared to 16 of 28 in 2021). 12 of 30 ATI partner countries presented some information on tax expenditures but excluded some core elements or expenditures (compared to 12 of 28 in 2021). While in 2021, no countries presented all core information on tax expenditures, two ATI partner countries met or exceeded the standard. Mongolia presented core information on all tax expenditures and Georgia presented information beyond the core elements for all tax expenditures.

Five ATI partner countries improved their presentation of core information on tax expenditure. Three[106] improved from presenting no information in 2021 to presenting some information in 2023. Mongolia[107] presented all core information in 2023. In 2023, Georgia improved to presenting information beyond the core elements in 2023, ranking the highest among the 30 ATI partner countries.

Two ATI partner countries saw a deterioration in presentation of core information, having presented some information in 2021, but none in 2023.[108]

The ATI Monitoring Framework also assesses revenues forgone, reported by GTED. Measuring the amount of revenue that a government does not collect, due to tax exemptions, waivers, de-

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102 Namibia and the Philippines.

103 Afghanistan, Malawi, Pakistan and Togo.

104 Bangladesh, Benin, Cameroon, Ecuador, Georgia, Ghana, Indonesia, Kenya, Liberia, Madagascar, Namibia, Nigeria, Paraguay, Philippines, Rwanda, Senegal, Sierra Leone and Uganda.

105 Afghanistan, Ethiopia and Malawi.

106 Liberia, Paraguay, and Tanzania.

107 Mongolia.

108 Burkina Faso and Ghana.

ductions or credits, enables them to understand the financial impacts of tax policies and make more informed budgetary decisions. Data on revenues foregone in relation to taxes on goods and services, income and property were available for 23 ATI partner countries in 2021 (**table 4.2**) as a percentage of GDP. In the 2020 Monitoring Report, taxes on goods and services continue to be the most substantial source of revenues forgone, ranging from 0.58% to 9.48% of GDP. Reporting on revenues forgone in relation to taxes on property remain limited. Where figures are reported, taxes on property are low in comparison to other tax types.

ATI partner countries	*Taxes on goods and services*	*Taxes on income*	*Taxes on property*
Bangladesh	-	3.56	-
Benin	1.86	0.00	0.00
Burkina Faso	0.58	0.65	0.00
Ecuador	2.91	2.99	0.08
Ethiopia	2.78	-	-
Georgia	4.11	0.49	-
Ghana	0.68	-	-
Indonesia	1.13	0.69	0.00
Kenya	2.20	0.22	-
Madagascar	2.73	0.18	-
Maldives	9.48	0.01	1.07
Mauritania	2.79	0.32	-
Mongolia	1.15	1.08	-
Niger	1.56	0.36	-
Nigeria	3.31	0.55	-
Pakistan	1.55	0.80	-
Paraguay	1.21	0.24	-
Philippines	1.75	0.15	-
Rwanda	2.71	0.50	-
Sierra Leone	1.84	-	-
Tanzania	0.99	-	-
Togo	1.53	0.74	0.00
Uganda	1.12	0.29	-

Table 4.2 Tax revenues foregone by type of tax, % GDP, 2021

Source: GTED

Engagement with non-state actors on tax issues

Governments will often engage with non-state actors on tax issues to foster collaboration, improve policy outcomes and enhance the effectiveness of tax systems. Stakeholders, including civil society, industry experts, the business sector and academia, bring diverse perspectives and expertise that inform the development of tax policies, ensuring that they are responsive to real-world challenges and achieve their intended policy goals. Their participation in the tax policy process also builds public trust in tax systems. When citizens have opportunities to shape tax policies, they are more likely to view the system as fair and legitimate, which can improve tax compliance.

The ATI Monitoring Survey asks partner country governments whether they conducted public consultations on tax policies between 2021-2023. An overview from the 15[109] ATI partner countries that responded to this question is presented below, with all but two noting that relevant consultations were held.

- **Bangladesh:** Yes, in the formulation of their Medium and Long-Term Revenue Strategy, the National Board of Revenue held pre-budget consultations with a wide range of stakeholders, including business associations, sector-specific trade bodies, professional organisations, economic think tanks and research institutions, and various civil society groups. Approximately 150 participant organisations were involved.
- **Ecuador:** No, consultations on tax policy were not opened. Tax policy is issued by the Executive and approved by the Ministry of Economy and Finance. The Internal Revenue Service is responsible for collecting internal taxes and prompting compliance with tax regulations. Taxpayers are able to contact the Internal Revenue Service to make queries and request clarification on tax obligations.
- **Georgia:** Yes, when communicating planned tax law amendments, the Ministry of Finance publishes drafts for public review. Regular meetings are held with private audit companies, major business associations and their members, and the wider business community to discuss tax law drafts. Their comments and views are often taken into account, alongside the tax policy objectives.
- **Ghana:** Yes, town hall meetings are held for proposed legislation and amendments to existing tax laws. These are largely attended by tax consultants, trade unions, and professional bodies.
- **Indonesia:** Yes, the government organises focus group discussions with taxpayers, tax consultants, and associations of tax consultants as part of consultation on policies.
- **Kenya:** Yes, the Kenyan government conducts open public consultations about tax policies through online platforms, town hall meetings, and public hearings, as well as media engagements (television and radio). During consultations, citizens and stakeholders are able to input into proposed tax measures before they are enacted. Consultations begin with a call for input, followed by stakeholder meetings and submission of written comments. Following this are public hearings involving the Finance and National Planning Committee, and finally the finalisation and publication of the finance bill.

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109 A total of 16 partner countries submitted the 2023 ATI Monitoring Survey, but Liberia did not respond to questions on ATI Commitment 4.

- **Madagascar:** Yes, the Malagasy Tax Administration regularly holds Private Public Dialogues that take place twice a year before establishing and drafting finance laws and amendments.
- **Maldives:** Yes, the Maldives Island Revenue Authority (MIRA) publishes proposed tax regulations and drafts on their website for public comments. The preliminary draft of the Income Tax Regulation was open for public consultation in 2020 and was shared with key stakeholders and authorities for comments, receiving comments from 11 parties.
- **Nigeria:** No, consultations on tax policy were not opened.
- **Pakistan:** Yes, consultations are held with lawyers, chambers of commerce, and industry bodies (e.g., manufacturing).
- **Philippines:** Yes, the Philippine government opened public consultation channels on tax policies from 2021 to 2023. These consultations were conducted through various channels, including town hall meetings and online communication platforms. The Fiscal Incentives Review Board (FIRB) also engaged with investment promotion agencies and registered business enterprises to explain and gather feedback on policies concerning tax incentives. Between 2021-2023, the FIRB held 52 stakeholder engagement sessions, reaching 15,993 participants.
- **Rwanda:** Yes, tax reform consultations are carried out through the tax policy committee, formed of the private sector, civil society organisations, government bodies and tax advisors. The consultation model varies according to the reform proposal. For example, the tax policy committee held citizen town halls in at least two districts in each province during 2023 property tax reforms.
- **Sierra Leone:** Yes, engagement with civil society, taxpayers, professional bodies, and public officials was conducted through town hall meetings, workshops, and media engagement (radio and television). Sierra Leone engaged with stakeholder groups during and after the design of their Medium-Term Revenue Strategy 2023-2027, Strategic Plan 2023-2027, Finance Acts, other revenue related policy documents and administrative initiatives. The government also held workshops with tax advisors on the Finance Act 2023 and 2024 alongside private sector and development partner engagements.
- **The Gambia:** Yes, the Gambia Revenue Authority (GRA) conducts weekly radio talk shows to educate taxpayers on their obligations and provide clarifications to callers. The GRA also conducts tax seminars with sectors (e.g., local authorities, tertiary institutions, chamber of commerce and taxpayers) to discuss tax policies with a targeted number of up to 40 participants.
- **Zambia:** Yes, the Ministry of Finance and National Planning conducts public consultations in line with the Planning and Budgeting Act No.1 of 2020. This includes countrywide consultation with stakeholders on proposals to be considered in the National Budget via townhall meetings, TV and radio stations as well as social media platforms. It also includes ministerial meetings to analyse tax and non-tax measures and publishing the Medium-Term Budget Plan and the National Budget for consultation. Stakeholder groups include the national assembly, sector ministries, government agencies, civil society, NGO's, researchers, private companies, marginalised groups, and individuals.

The OBS assesses the degree to which citizens are engaged during budget formulation, budget implementation, and legislative deliberations. It also includes an assessment of whether infor-

mation is shared prior to engagement to support informed participation, and whether feedback is provided in response to citizens' inputs. Countries are scored on the basis of whether they meet all (100), most (67), some (33) or none (0) of the requirements for each indicator. While there has been some progress among ATI partner countries across these indicators since the 2021 OBS, public engagement on tax matters remains limited across budget formulation, budget implementation and legislative. This is also the case for information being provided to citizens ahead of consultation and use of feedback mechanisms. Country scores across five key OBS questions are explored below, however only changes in country scores are highlighted. Individual country scores are shown in **Table 4.3** below.

Six ATI partner countries' scores increased in relation to public engagement on budget formulation. Burkina Faso's score improved from 0 to 100 in 2023, and Cameroon's score from 33 to 100. The Gambia's score increased from 33 to 67, Liberia and Namibia's scores improved from 0 to 67, and Tanzania's score from 0 to 33. 3 ATI partner countries' scores decreased in 2023. Bangladesh and Ghana's scores decreased from 67 in 2021 to 33 in 2023, and Afghanistan's score decreased from 67 to 0.

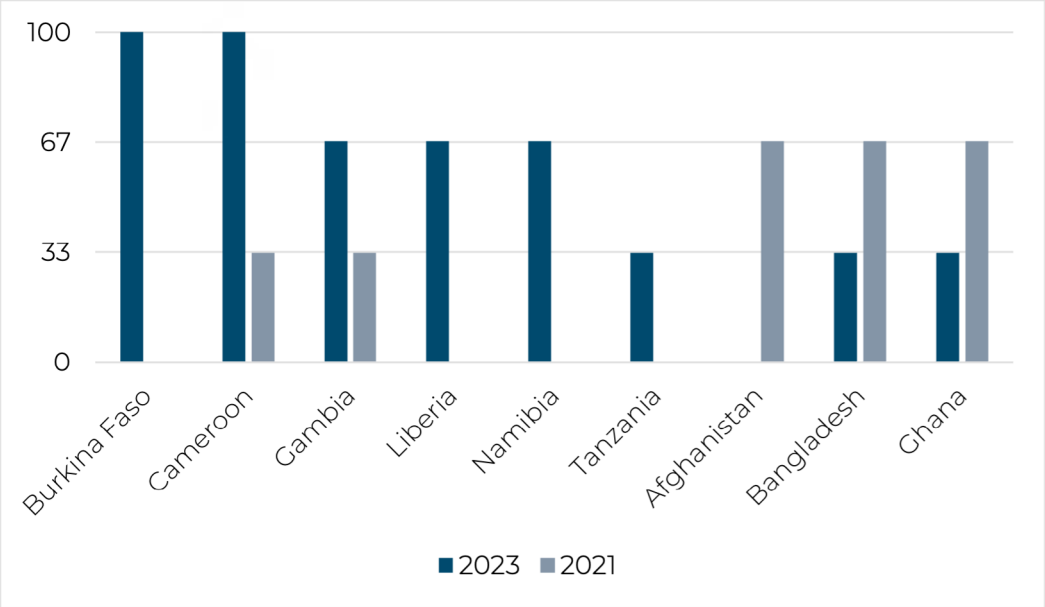

Figure 4.2 OBS 127: During the budget formulation stage, which of the following key topics does the executive's engagement with citizens cover?

In relation to citizen engagement on the implementation of the annual budget, Eight ATI partner countries' scores increased between 2021 and 2023. Burkina Faso, the Gambia, Paraguay, Sierra Leone and Togo all increased their scores from 0 in 2021 to 33 in 2023. Namibia's score improved from 0 to 67. The Philippines and Zambia improved their scores from 33 to 67 in 2023. Three ATI partner countries' scores decreased in 2023, compared to 2021. Liberia and Senegal's scores went from 33 in 2021 to 0 in 2023, while Ecuador's score decreased from 67 to 0.

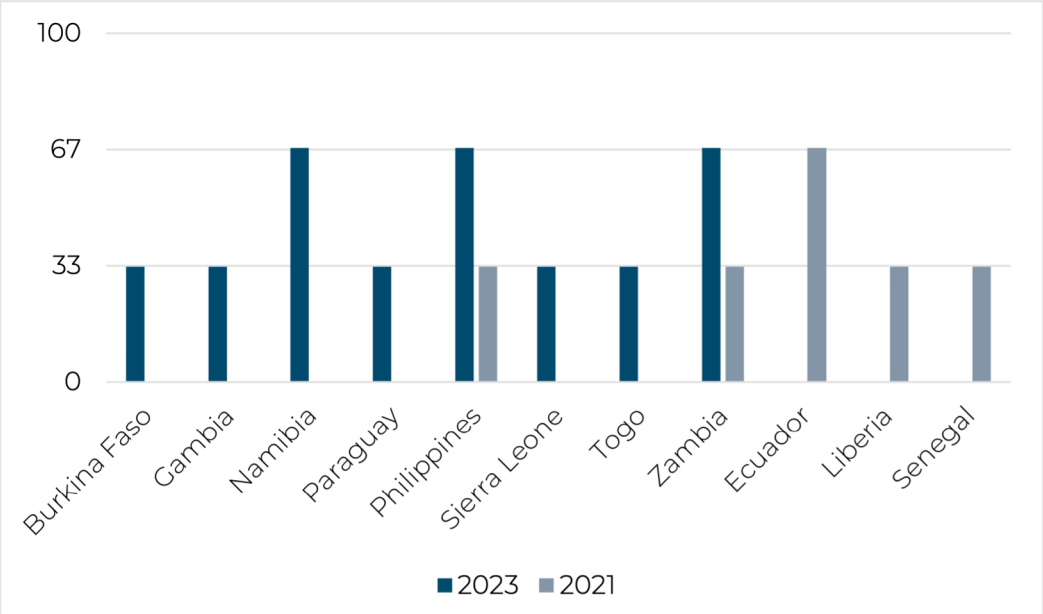

Figure 4.3 OBS 130: During the implementation of the annual budget, which of the following topics does the executive's engagement with citizens cover?

Three ATI partner countries' scores improved in relation to providing comprehensive prior information on the process of engagement, enabling the public to participate in an informed manner. The Gambia, Liberia and Mongolia all improved their scores from 0 in 2021 to 33 in 2023. Only Ecuador's score decreased between 2021 and 2023, from 33 to 0.

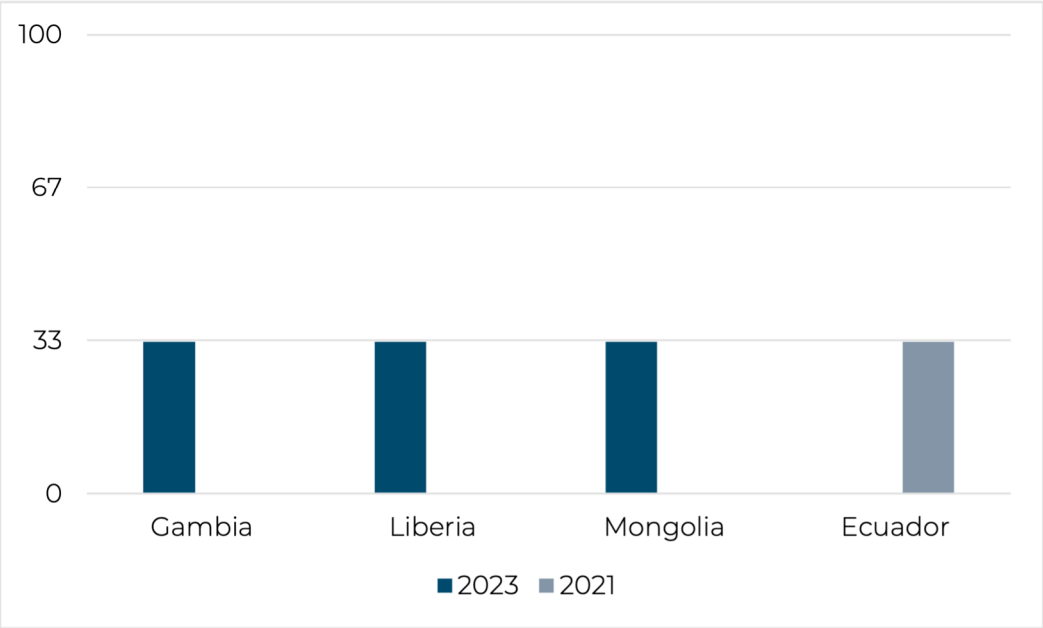

Figure 4.4 OBS 131: When the executive engages with the public, does it provide comprehensive prior information on the process of the engagement, so that the public can participate in an informed manner?

Regarding consultation on legislative deliberations, two ATI partner countries increased their scores between 2021 and 2023. Mongolia's score improved from 0 to 33 while the Gambia's score improved from 0 to 100. Three ATI partner countries' scores decreased in 2023. Zambia's score went from 100 to 67 in 2023, Ecuador's score went from 67 to 33 in 2023, and the Philippines score went from 33 to 0.

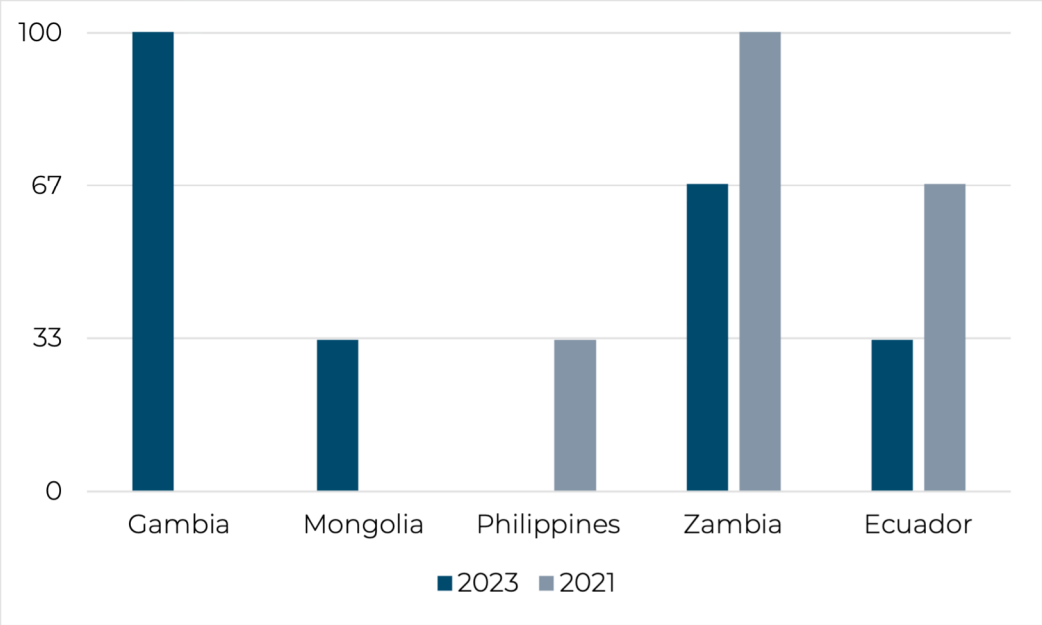

Figure 4.5 OBS 137: During the legislative deliberations on the annual budget (pre-budget or approval stages), which of the following key topics does the legislature's (or relevant legislative budget committee) engagement with citizens cover?

Finally, one ATI partner country's score increased on providing feedback to the public on how citizens' inputs were used during legislative deliberations. Benin's score increased from 0 in 2021 to 33 in 2023, however scores across nearly all 30 ATI partner countries assessed under the OBS remain at 0.

While there are some positive improvements being made by many ATI partner countries in relation to public consultation on tax matters, most countries still do not meet all criteria set out in the IBP's indicators. Increased efforts will need to be made by ATI partner countries over the course of 2024-2025 to continue to improve public consultation across these five key indicators.

Country	*Budget formulation*	*Budget implementation*	*Prior information*	*Legislative deliberations*	*Feedback*
Afghanistan	0	0	0	0	0
Bangladesh	33	0	33	33	0
Benin	100	0	33	100	33
Burkina Faso	100	33	0	0	0

Cameroon	100	33	67	0	0
Ecuador	0	0	0	33	0
Ethiopia	0	0	0	33	0
Gambia	67	33	33	100	0
Georgia	67	0	0	100	33
Ghana	33	0	33	0	0
Indonesia	67	33	33	0	0
Kenya	67	0	33	100	67
Liberia	67	0	33	0	0
Madagascar	33	0	0	0	0
Malawi	33	0	33	0	0
Mongolia	0	33	33	33	0
Namibia	67	67	0	0	0
Nepal	33	33	33	33	0
Niger	0	0	0	0	0
Pakistan	33	33	0	0	0
Paraguay	0	33	0	0	0
Philippines	33	67	33	0	0
Rwanda	33	33	33	0	0
Senegal	0	0	0	0	0
Sierra Leone	67	33	33	0	0
Tanzania	33	0	0	33	0
Togo	0	33	0	0	0
Uganda	33	33	0	0	0
Zambia	33	67	33	67	100
Nigeria	67	67	33	67	0

Table 4.3: Partner country scores on citizen engagement

Source: IBP OBS, questions 127, 130, 131, 137, 138

Enhancing capacity of accountability stakeholders to engage in tax issues

Accountability in tax matters requires not only transparency and engagement with non-state actors, but also the capacity of stakeholders to effectively participate in tax policy processes.

Strengthening the knowledge, skills, and resources of non-state actors can serve to reinforce the accountability link between taxpayers and governments.

A review of summary descriptions of ODA for DRM projects supported by ATI development partners shows that in 2021, 21% of projects[110] included key language promoting accountability, transparency and the role of non-state actors in relation to tax policy and practice, up from 14% in 2020.[111] While this figure decreased in 2022 (16%), the slight increase in 2023 to 17% is a promising step towards sustained focus on accountability and capacity building.

A further assessment of recipient codes for ODA for DRM projects show that in 2023, 4.5% of total ODA was provided directly to civil society organisations as primary implementing partners, down from 5.4% in 2022 and 5.8% in 2021.

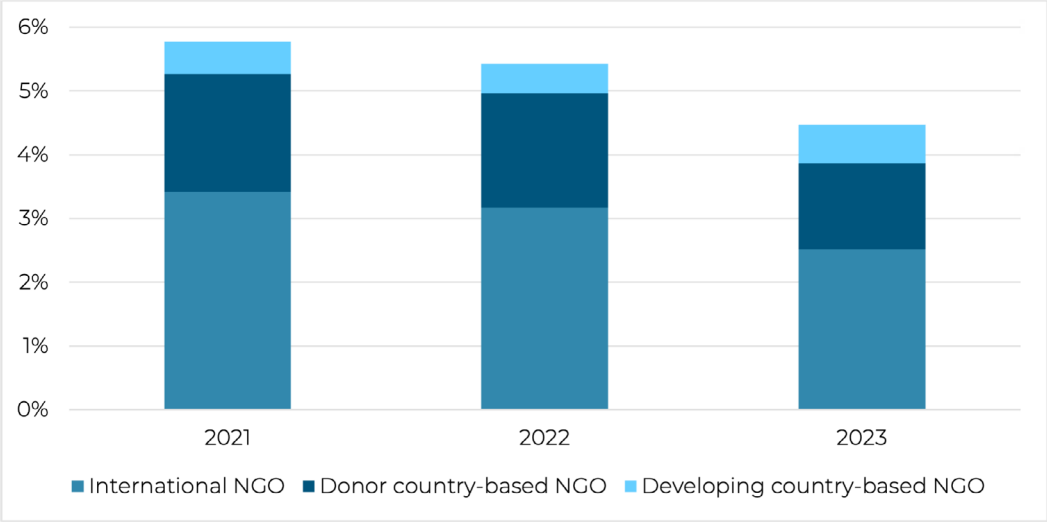

Figure 4.6: DRM support by ATI development partners towards non-state actors (CRS channel codes 21000, 22000, 23000)

Source: ATI DRM Database.

The 2023 ATI Monitoring Survey also asked respondents to provide estimates of the number of stakeholders that provided inputs into public consultations on tax issues. Four ATI partner country respondents provided such estimates:

- **Bangladesh:** The estimated number of participant organisations involved was approximately 150.
- **Maldives:** MIRA received comments from 11 parties for the income tax regulation online consultation.
- **The Philippines:** The government held 52 sessions across 2021-2023, reaching 15,993 participants.
- **The Gambia:** The GRA conducts tax seminars with select sectors with a target number of up to 40 participants per seminar.

110 Measured by ODA value.

111 Based on a key word search for: accountability; NGO; civil society; participation; inclusion.

Case Study

Top-down and bottom-up: Kenya's approach to tax policy consultation, transparency and equity

Kenya has made significant strides in fostering transparency and participation in tax policy processes through a blend of top-down and bottom-up approaches across its national institutions and civil society.

At the national level, stakeholder engagement is institutionalised within the Kenyan constitution, where public consultations form part of a larger commitment to transparency, accountability, and inclusive governance. The consultation process allows citizens to feed into both county and national policy, providing inputs on tax measures before they are enacted and implemented.

The inclusive public consultations in Kenya attract a wide range of stakeholders across sectors, including:

- Government bodies that can provide technical inputs on policy proposals;
- Business associations representing various industries, as well as small and medium enterprises which may be disproportionately affected by tax changes;
- Civil society organisations, such as those focusing on social justice, economic policy, and public finance, as well as consumer advocacy groups that represent the interests of consumers in discussions on indirect taxes (e.g., VAT);
- Academic and research institutions that can provide evidence-based research analysis on the potential impacts of proposed tax measures;
- Labour unions and workers' organisations that represent the interests of the workers;
- International organisations and development partners that can provide technical support on tax policy reforms and capacity building.

Kenya uses various channels to encourage engagement in the consultation process, including:

- Online platforms through the National Treasury and Economic Planning, as well as the Kenya Revenue Authority websites;
- Townhall meetings and public hearings (e.g., county-level engagements), and parliamentary committee hearings;
- Media, such as radio and television engagements.

While a government-led top-down approach to consultation ensures adequate opportunities for citizens to input into tax policies, it is important that citizen groups take advantage of these opportunities to engage. Civil society actors can play a pivotal role in generating public participation and building the capacities of citizens to advocate for equitable tax policies and improved public spending.

In Kenya, the Strengthening Public Accountability for Results and Knowledge (SPARK) programme (implemented by the International Budget Partnership) partners with civic organisations, providing them with technical assistance, strategic guidance, and training on budget analysis to help them advocate for improved public spending. Since 2014, the SPARK programme has support-

ed the training of over 100 county budget facilitators and more than 1000 community budget champions, expanding support to civil society organisations across 47 counties. By generating informed coalitions of budget analysts and reform allies, including oversight and media actors, the SPARK programme has led to lasting changes in openness, inclusion and transparency in the budgeting process. There is a strong partnership between the Kenyan government and these citizen groups in the pursuit of equitable tax policy, and the government values their critical inputs.

This dual approach to consultation and transparency ensures that tax policies prioritise equity, setting a strong precedent for inclusive fiscal governance. With ample institutionalised opportunities to engage on tax policy matters, informed through the support of programmes like SPARK, Kenya is better able to ensure that its tax policies are equitable, transparent and reflective of diverse stakeholder needs.

Expert piece

How a UN Framework Convention on tax could strengthen accountability in global tax governance

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International Centre for Tax and Development (ICTD)

The deepening politicisation of global tax governance in recent years has confronted the international tax regime with expectations of accountability, transparency, and inclusivity. Much more than in the past, parliamentarians, civil society organisations, and the media in the global North and South are following the work of the OECD, UN and others. Consequently, the legitimacy of existing forums for cooperation such as the Inclusive Framework and UN Tax Committee is challenged both by their member states and by non-state actors, whose criticism often relates to the lack of political representation in the current set-up of highly technical negotiations. The OECD has responded to these concerns by creating numerically inclusive bodies that assemble technical officials from a growing number of states. So far, this has been insufficient to absorb the political pushback from developing countries and non-state actors, culminating in the UN tax convention.[112]

At the national level, international tax policy is in some partner countries still the exclusive ambit of the executive branch of government, which many times adopts international tax reforms with no or minimal involvement of accountability stakeholders, such as parliaments, the media and civil society organisations.[113] Yet, this is slowly changing, not least due to efforts by non-governmental organisations to sensitise parliamentarians on international tax issues.[114] A case in point is the court case brought by the CSO Tax Justice Network Africa, against the Kenyan government, which led to the overturning of its tax treaty with Mauritius due to a lack of parliamentary involvement

[112] Katharina Kuhn et al., "The International Tax Regime Complex: Understanding Change in Global Tax Governance," ICTD Working Paper, 2024, https://www.ictd.ac/publication/international-tax-regime-complex-change-global-tax-governance/.

[113] Juliana Cubillos González and Frederik Heitmüller, "Empirical Research: Influence of Domestic Constituencies in the Implementation of International Tax Standards and Legitimacy of Global Tax Governance," Intertax 52, no. 3 (2024); Martin Hearson, Imposing Standards: The North-South Dimension to Global Tax Politics, Cornell Studies in Money (Ithaca [New York]: Cornell University Press, 2021).

[114] See for instance the African Parliamentary Network on Illicit Financial Flows and Taxationhttps://apnifft.taxjusticeafrica.net/

in its ratification.[115]

A UN Framework Convention on Tax offers the potential to strengthen accountability stakeholders in various ways. First, a move to the UN as main forum for negotiations will modify the composition of negotiating teams, towards more diplomatic staff. This will profoundly alter the nature of negotiations by shifting the focus from technical discourse between tax officials to more explicitly political questions, thereby providing a forum that is political in nature. By linking international tax policy to broader social issues, larger sections of governments and an increasing number of accountability stakeholders will likely start contributing to international tax debates.[116]

Second, the UN has mechanisms and procedures in place to ensure the access and participation of non-state actors. In addition, many civil society organisations can build on their existing networks from engaging in UN Financing for Development discussions to influence international tax negotiations at the UN. This, together with mechanisms of transparency will render the negotiation process more accessible both for non-governmental stakeholders and for media outlets in partner countries. It should be noted that transparency would further be aided by greater language inclusivity, which implies timely translations of negotiating drafts.[117]

Third, by developing binding international legal instruments as opposed to non-binding technical standards and recommendations, a UN Framework Convention for International Tax Cooperation may provide for a greater involvement of parliaments and other accountability actors by default in the process of ratifying and implementing the output of global tax cooperation.

Some of these effects are already playing out in the process of negotiating the Convention: the public broadcasting of negotiations, the participation of government officials from various departments and the opportunity for other stakeholders to observe the negotiations, for instance, allow for a more transparent and political process.[118] Yet, for these effects to last, they need to be institutionalised in the outcome of negotiations and upheld throughout the process. Moreover, to produce the potential positive effects outlined above, the UN Framework Convention needs to ensure the wide-spread and lasting support of partner countries, which in turn depends on its ability to solve the policy problems faced by its members.

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115 Tax Justice Network- Africa v Cabinet Secretary for National Treasury & 2 others [2019] eKLR https://kenyalaw.org/caselaw/cases/view/169664

116 Kuhn et al., "The International Tax Regime Complex: Understanding Change in Global Tax Governance."

117 Lucinda Cadzow et al., "Inclusive and Effective International Tax Cooperation: Views From the Global South," ICTD Working Paper, 2023, https://www.ictd.ac/publication/inclusive-effective-international-tax-cooperation/.

118 Martin Hearson, "What to Do with a Global Majority: Making the Most of a UN Tax Convention," ICTD Blog (blog), May 22, 2024, https://www.ictd.ac/blog/what-to-do-with-a-global-majority-making-the-most-of-a-un-tax-convention/.

ATI supporting organisations

Introduction

The Addis Tax Initiative (ATI) is supported by a diverse group of international organisations, forums, academic institutions, civil society groups and private sector foundations. While their roles vary in terms of activities, focus areas, country engagement, and delivery methods, these partners endorse the ATI's goals and contribute technical assistance and other support to strengthen domestic revenue mobilisation (DRM) in partner countries.

The ATI Monitoring Report provides an opportunity for supporting organisations to report on their activities in support of DRM efforts in ATI member countries. Of 20 ATI supporting organisations, six provided responses to the 2023 monitoring survey, which are presented below.

Asian Development Bank

With 50 Development Member Countries (DMCs) and 19 non-regional member countries, the Asian Development Bank (ADB) supports countries across the Asia-Pacific region in strengthening DRM by fostering strategic policy dialogue, knowledge sharing, and capacity building to enhance resilience and sustainable development. Its work includes helping DMCs develop medium-term revenue strategies, advancing tax administration digitalisation, and integrating gender and climate considerations into policy frameworks and financial support. Partnering with global bodies, ADB also assists DMCs in meeting international standards for transparency and financial integrity, contributing to more effective and inclusive DRM efforts.

Commitment 1

In 2021, ADB established the Asia Pacific Tax Hub (APTH) to serve as an open and inclusive platform for strategic policy dialogue, knowledge sharing and development coordination on DRM among ADB members and development partners. Through the APTH, ADB has assisted countries with various DRM-related initiatives, including the preparation of medium-term revenue strategies (MTRS); conducting tax policy reviews and Tax Administration Diagnostic Assessment Tool (TADAT) assessments; publishing tax expenditure estimation toolkits; and providing capacity building and technical assistance on tax-related issues such as gender and tax, gender-responsive budgeting, and environmental taxes such as carbon pricing and fossil fuel subsidy reduction. Gender and climate change considerations are also regularly integrated into policy-based loans, serving as policy actions tied to budget support.

ADB also supports the digital transformation of tax administrations. Since 2021, it has co-hosted both virtual and in-person events focused on tax administration digitalisation and assisted member countries in designing roadmaps to advance tax administration through digital transformation.

Commitment 3

In close partnership with the Global Forum, ADB provides technical assistance to member countries to achieve satisfactory ratings in the Standard for Exchange of Information on Request (EOIR) and Standard on Automatic Exchange of Information (AEOI) reviews. ADB also hosted the first regional tax and anti-money laundering blended beneficial ownership workshop, collaborating with the Global Forum, FATF regional bodies, Belgium, HMRC and civil society organisations.

Global Forum on Transparency and Exchange of Information for Tax Purposes

The Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) comprises 171 member jurisdictions, with more than half being developing countries. In 2011, its Secretariat developed a comprehensive capacity building programme to support the adoption and effective use of tax transparency standards in these countries, aiming to combat cross-border tax evasion and strengthen DRM. This programme, guided by a strategy adopted in 2020, focuses on three core priorities: raising awareness among decision-makers, senior officials, and key stakeholders whose support is essential for implementing and benefiting from tax transparency reforms; building the knowledge and skills of tax and government officials through targeted training and knowledge-sharing tools; and providing tailored technical assistance, guidance, and coaching to support the effective implementation and use of exchange of information (EOI) standards.

Commitment 1

In relation to Commitment 1, the Global Forum's capacity building programme recognises that gender equality and inclusion are essential to strengthening tax administrations and fostering broad-based ownership and sustainability of DRM support. To help reduce gender gaps in tax administrations, particularly in developing countries, the Global Forum ensures gender-balanced participation in its training events. In 2022, it also launched the Women Leaders in Tax Transparency programme. This initiative aims to build a network of female officials from tax administrations and ministries of finance, empowering them to take on leadership roles in tax transparency and to serve as role models within their institutions.

Commitment 3

Through its capacity building programme, the Global Forum has enabled developing countries to implement tax transparency standards to combat tax evasion, resulting in at least EUR 45 billion in additional revenue identified in developing member countries between 2009 and 2023. Specifically, the Global Forum supports developing countries to join the Convention on Mutual Administrative Assistance in Tax Matters (MAAC), implement the Standard Exchange of Information on Request (EOIR), implement the Standard on Automatic Exchange of Information (AEOI) and ensure the transparency of beneficial ownership information.

Kenya is a standout example where intensive technical assistance enabled a dramatic rise in exchange of information requests, from just one in 2018 to 264 in 2023. Recognising the benefits of information exchange, Kenya voluntarily committed to the Common Reporting Standard (CRS) in 2020. With comprehensive support from the Global Forum Secretariat, Kenya established the necessary legal, administrative and technical frameworks, including ratification of the MAAC, signing the CRS Multilateral Competent Authority Agreement (CRS-MCAA), and enacting domestic legislation. Awareness-raising among financial institutions and IT system development further enabled Kenya to successfully conduct its first automatic exchanges, receiving data from 41 jurisdictions and sending data to 48 jurisdictions.

Inter-American Center of Tax Administrations

The Inter-American Center of Tax Administrations (CIAT) supports DRM by strengthening the institutional and technical capacities of tax administrations across its member countries. Through a combination of training programmes, targeted technical assistance, and innovative digital tools,

CIAT equips tax officials with the skills and systems needed to implement efficient, effective, and transparent tax policies.

Commitment 1

CIAT's work contributes significantly to ATI Commitment 1 by strengthening the operational and strategic capacity of tax administrations, enabling more equitable, efficient, and transparent revenue collection. Through institutional strengthening projects, such as strategic alignment and modernisation efforts in Brazil, Panama, and Honduras, CIAT has helped improve the effectiveness of tax authorities. In 2023 alone, over 269 tax officials participated in training programs covering key technical areas including transfer pricing, electronic invoicing, tax ethics, and business analytics. CIAT also deployed its Digital Economy Compliance tool to support transparent and efficient VAT collection in the digital economy. Additionally, specialised courses on green taxation, crypto-assets, and gender-responsive tax policies are equipping tax officials with the knowledge and skills needed to build more equitable and forward-looking tax systems.

Commitment 3

CIAT aims to reduce tax-related illicit financial flows (IFFs) and promote policy coherence, in line with ATI Commitment 3. It does so through targeted capacity-building initiatives such as courses on financial transactions, the exchange of information, and the taxation of crypto-assets, empowering tax officials to better detect and address tax avoidance, evasion, and IFFs. CIAT has also developed practical tools such as guides for safeguarding information and business continuity plans, which help tax administrations protect sensitive data and ensure operational resilience. CIAT's collaborative technical assistance, such as the support provided to Ecuador on data-driven risk management, also helps align national tax reforms with international standards and fosters more effective and transparent tax systems.

International Budget Partnership

The International Budget Partnership (IBP) is a key supporting organisation of the ATI, with a strong focus on promoting transparency, accountability, and civic engagement in DRM. Through its flagship Open Budget Survey (OBS), IBP contributes critical data to ATI's monitoring framework, particularly for Commitment 4, by assessing the transparency of tax and budget systems across countries.

IBP's technical assistance efforts prioritise strengthening the collective capacities of diverse civic actors and coalitions in countries such as Nigeria, Senegal, Tanzania, and Ghana. These efforts are designed to enhance citizen participation in tax policy processes and drive progress toward equitable tax reforms. Activities include capacity needs assessments, targeted training on issues like tax expenditure, gender and taxation, multiple taxation, and equitable tax policy, as well as strategic support to facilitate reform.

Commitment 1

IBP's Tax Equity Initiative demonstrates a strong commitment to advancing gender equality in taxation by addressing how tax systems disproportionately affect women, particularly in the informal sector. In Nigeria, IBP and its partners successfully campaigned to reduce the tax burden on women small business owners in Cross River State, cutting weekly taxes from N6200 to N1800 and lowering the tax-to-income ratio from 124% to 36%. This was achieved through collaborative

research and partnerships with women's networks, tax experts, and government agencies, which exposed gender-discriminatory tax practices and called for gender-responsive reforms such as progressive tax structures, childcare subsidies, and incentives for women-led businesses. Efforts also included advocating for gender-disaggregated data collection to inform equitable tax policy.

Commitment 4

With a focus on increasing the role of civil society, IBP played a key role in developing ATI's approach to engaging accountability stakeholders, including by hosting webinars, facilitating policy forums, and developing case studies demonstrating how civil society can support ATI partner countries in implementing equitable tax reforms. IBP's engagement contributed to a shift in ATI's framing of civil society's role, emphasising meaningful civic participation throughout the tax policy cycle.

IBP has also been involved in shaping the indicators for the ATI monitoring framework, ensuring they reflect the importance of transparency, accountability, and civic engagement. IBP's Open Budget Survey (OBS) is a key data input in assessing tax transparency under Commitment 4, providing a robust, comparative measure of public access to budget and fiscal information, which includes insights into tax policy and revenue transparency.

In countries like Nigeria and Senegal, IBP works directly with partners to strengthen their capacity to engage in tax systems, offering training on tax equity, gender and taxation, tax expenditures, and advocacy. These efforts enabled partners in both countries to carry out 62 joint advocacy initiatives in 2023 alone, promoting more participatory, responsive, and equitable tax processes.

At the global level, IBP also partnered with the Global Initiative for Fiscal Transparency (GIFT) in 2022 to develop the *Transparency Principles for Tax Policy and Administration* and the accompanying guide *Making Tax Work: A Framework for Enhancing Tax Transparency*, further advancing global standards for open and accountable tax systems.

International Institute for Sustainable Development

The International Institute for Sustainable Development (IISD) advances DRM through innovative research, practical advisory services, capacity-building, and strategic convening. With a focus on the mining sector, IISD provides in-depth technical assistance, generates influential policy guidance, and facilitates global dialogue on extractive taxation.

Commitment 1

IISD provides tailored legal and policy advice to governments on mining taxation, covering fiscal regimes, tax treaties, global tax reforms, and administrative enforcement. Between 2020–2024, IISD responded to 17 advisory requests from 14 countries and one international organisation. In Namibia, IISD advised the Ministry of Finance and Namibian Revenue Authority on global tax reforms and tax liability in the mining sector. In Togo, IISD reviewed the fiscal terms of the mining code and manganese pricing, as well as provided support on adapting to the global minimum tax on multinational corporations, as part of the OECD's efforts to advance Pillar Two of the Global Anti-Base Erosion initiative.

IISD also works with selected countries on long-term technical assistance, based on identified DRM needs in the mining sector. Selected countries between 2021 and 2023 include ATI partner countries Ecuador, Mongolia, Senegal and Zambia.

Finally, as a member of the Subcommittee on Extractive Industry Taxation since 2019, IISD's contributions have also shaped international tax guidance. Notably, IISD's work led to:

- The inclusion of a chapter on designing and using tax incentives in the UN Handbook on Extractive Industry Taxation (adopted by the UN Committee of Tax Experts in October 2022)
- Key inputs into updates for the UN Model Tax Convention, including a proposed permanent establishment provision for extractives

Commitment 4

In June 2023, IISD published *The Future of Resource Taxation (FRT): 10 Policy Ideas to Mobilize Mining Revenues*, which aims to prompt governments, industry, and civil society to think critically about whether the current system of mining taxation is fit for modern use. The FRT is based on feedback from officials in 49 countries in Africa, Asia, and South America, identifying fiscal objectives and revenue collection challenges related to the mining sector. It has facilitated exchanges between government, industry, civil society and academic representatives across regions.

Trust, Accountability and Inclusion Collaborative

The Trust, Accountability and Inclusion Collaborative (TAI) engages primarily with philanthropies and non-profits at regional and international levels, rather than directly with in-country governments. TAI informs donors and select bilateral development partners about research, campaigns, and events, especially those linked to tax administration reforms and initiatives.

Commitment 1

Recognising increased interest in the intersection of gender and tax, TAI organised a funders call on gender and tax in 2023, engaging philanthropies and bilateral donors. They are also engaging in strategy sessions with climate philanthropies to highlight the links between DRM and climate goals, particularly the importance of progressive tax policies.

Commitment 2

To advance Commitment 2, TAI promotes greater donor support for DRM. This has contributed to the emergence of new philanthropic funding initiatives focused on Latin America and Sub-Saharan Africa. Through their communications, TAI keeps donors informed about advocacy, research, and events tied to tax reform and broader initiatives such as UNDP's tax and Sustainable Development Goal (SDG) work.

Commitment 3

In support of Commitment 3, TAI fosters donor engagement through research, convenings, and learning activities addressing IFFs. Notably, TAI published a 2023 report on illicit finance and kleptocracy, highlighting the links between IFFs, global tax policy, anti-money laundering, and beneficial ownership transparency. An earlier evaluation on beneficial ownership transparency emphasised its importance in ending tax avoidance and boosting revenue mobilisation in partner countries.

Commitment 4

To fulfil Commitment 4, TAI supports dialogue between NGOs, philanthropies, and funders to strengthen accountability systems. TAI disseminates research and tools emphasising civil soci-

ety's role in DRM, from improving tax morale to exposing tax avoidance. Key outputs include a 2021 report on civil society in tax administration and a 2023 landscape study on international tax justice funding. Recent research also identifies critical funding gaps for civil society participation in fiscal policy, reinforcing the need to pair support for revenue authorities with investments in accountability actors. This complements ATI's growing emphasis on equity and fairness in tax reform, where public trust relies on perceived fairness.

West African Tax Administration Forum

West African Tax Administration Forum (WATAF) supports tax policy and administration efforts across West Africa, working with member states to strengthen DRM frameworks, promote regional collaboration, and address tax policy challenges.

Commitment 1

WATAF has taken significant steps to support member countries in designing and implementing robust DRM frameworks:

- In August 2022, WATAF developed a DRM Framework for its member states which it formally launched in September 2024.
- WATAF also developed a Strategic Support Plan for 2025–2027 to provide sustained technical assistance.
- A DRM Support Plan for 2025 was created to help members tailor and implement their national DRM Frameworks, ensuring involvement from all relevant revenue stakeholders.

Although WATAF does not yet run a dedicated gender equality program, it has supported such goals by participating in events led by peer organisations promoting gender-responsive tax policies. WATAF's 2025–2029 strategic plan includes a focus on addressing gender equality in tax systems across West Africa.

Commitment 3

WATAF supports Commitment 3 by facilitating high level policy dialogues with regional policymakers to address emerging tax challenges. In collaboration with the Economic Community of West African States (ECOWAS) and the West African Economic and Monetary Union (WAEMU), WATAF has developed practical tools for VAT management and tax expenditure reporting and is establishing a tax database to establish effective tax and customs policies in the region.

Commitment 4

WATAF's 2022 DRM Framework was funded by Open Society Foundations, which supports civil society groups to advance inclusive, accountable governments. WATAF is conducting sensitisation workshops with the ECOWAS Parliament and national parliaments, including the Gambia's, to raise awareness of DRM and international tax issues.

Conclusion

The second monitoring cycle under the ATI Declaration 2025 reveals steady, though uneven, progress across all four ATI commitments. In a challenging global context of shrinking fiscal space, growing debt burdens, and reductions in Official Development Assistance (ODA), the findings of this report underscore the critical importance of sustained efforts in domestic revenue mobilisation (DRM) as a foundation for long-term, inclusive development.

Under ATI Commitment 1, many partner countries have made measurable strides in strengthening tax policies and administration, with notable advances in environmental and gender-responsive taxation and improved institutional capacity through large taxpayer units and high-net-worth individual programmes. Yet, lessons learned from the economic shocks of COVID-19 and post-pandemic recovery indicate that resulting issues such as high arrears levels and variability in filing and payment compliance require targeted reforms and capacity-building support. This is particularly relevant as countries continue to face overlapping crises and decreased levels of ODA for DRM.

ATI Commitment 2 reflects both achievements and concerns. While ODA for DRM has increased by 17.5% since 2015, it declined significantly in 2023 compared to 2020 (-20.3%) and remains USD 160 million below the collective 2025 target. While 13 development partners doubled their disbursements with reference to 2015 at least once between 2020 and 2023, a declining trend is clearly visible. Encouragingly, a growing number of development partners are promoting country-owned approaches, utilising stakeholder engagement and collaboration to strengthen local systems and demand-driven approaches to partnership. However, regional and income-based disparities in allocation remain, as Least Developed Countries received less than a quarter of ODA for DRM in 2023, down from 35% in 2020. Progress must accelerate to meet the ATI's collective ambitions.

The report shows important steps forward under ATI Commitment 3, particularly through greater alignment with international tax standards such as the OECD/G20 BEPS framework. The increase in compliant tax agreements and information exchange relationships is promising, yet only a few development partners have undertaken spillover analyses to assess the cross-border impacts of their tax systems. Among partner countries, transparency in tax expenditures is expanding, but critical gaps persist, especially in publicly available budget documentation.

Finally, ATI Commitment 4, which focuses on inclusiveness and accountability in DRM, has seen momentum through more public tax strategies and broader data publication. Still, meaningful public engagement remains limited, and civil society organisations continue to receive only a small fraction of DRM support. Expanding the space and resources for accountability actors is vital to ensure participatory tax systems that reflect the needs of all citizens.

As countries continue to recover from overlapping crises and pursue the Sustainable Development Goals, the ATI's role as a platform for mutual learning, transparency, and joint action is more vital than ever. Strengthening cooperation, aligning resources with commitments, and centring equity and accountability in DRM efforts will be essential to realising the promise of the ATI Declaration 2025.

Annex

	2022	*2024*	*Change, 2022-24*
Afghanistan	0.61	0.65	0.04
Bangladesh	0.73	0.71	-0.02
Benin	0.59	0.72	0.13
Burkina Faso	0.51	0.65	0.14
Cameroon	0.69	0.71	0.02
Ecuador	0.64	0.69	0.05
Ethiopia	0.62	0.61	-0.01
The Gambia	0.59	0.59	0
Georgia	0.22	0.22	0
Ghana	0.6	0.52	-0.08
Indonesia	0.59	0.61	0.02
Kenya	0.61	0.62	0.01
Liberia	0.57	0.66	0.09
Madagascar	0.46	0.47	0.01
Malawi	0.67	0.69	0.02
Maldives	0.61	0.63	0.02
Mauritania	0.48	0.44	-0.04
Mongolia	0.42	0.42	0
Namibia	0.56	0.59	0.03
Nepal	0.68	0.75	0.07
Niger	0.57	0.62	0.05
Nigeria	0.61	0.62	0.01
Pakistan	0.66	0.68	0.02
Paraguay	0.33	0.33	0
Philippines	0.61	0.65	0.04
Rwanda	0.61	0.61	0
Senegal	0.53	0.54	0.01
Sierra Leone	0.53	0.53	0

Solomon Islands	0.48	0.5	0.02
Tanzania	0.54	0.56	0.02
Togo	0.7	0.76	0.06
Uganda	0.62	0.63	0.01
Zambia	0.71	0.7	-0.01
Average	0.57	0.60	-

Annex 1.1: CRI Index, Indicator T1A, 2022 and 2024

Source: CRI Index Indicator T1a, 2024

	LTO revenue (% of total tax revenue), 2022	*Percentage point change, 2020-22*	*HNWI unit*
Afghanistan	-	n/a	n/a
Bangladesh	26	-3	No
Benin	74	-7	Yes
Burkina Faso	-	n/a	Yes
Cameroon	79	9	No
Ecuador	50	-4	Yes
Ethiopia	-	n/a	n/a
The Gambia	75	-9	No
Georgia	34	-14	n/a
Ghana	68	50	Yes
Indonesia	28	1	Yes
Kenya	38	2	Yes
Liberia	36	-10	No
Madagascar	87	5	n/a
Malawi	95	30	n/a
Maldives	67	-2	n/a
Mauritania	81	n/a	n/a
Mongolia	79	19	Yes
Namibia	52	1	No
Nepal	38	7	n/a
Niger	70	-2	n/a
Nigeria	85	-2	No
Pakistan	68	62	No
Paraguay	60	-7	No
Philippines	-	n/a	No
Rwanda	57	-5	No
Senegal	10	9	n/a
Sierra Leone	60	-20	n/a
Solomon Islands	80	n/a	n/a
Tanzania	-	n/a	No

Togo	65	-15	n/a
Uganda	63	-0.4	Yes
Zambia	80	25	n/a

Annex 1.2: Large Taxpayer Offices (LTOs) and High Net Worth Individual (HNWI) units, 2022

Source: ISORA, 2022

	2020 (%)	*2021 (%)*	*2022 (%)*
Afghanistan	-	-	-
Bangladesh	-	0	70
Benin	67	68	100
Burkina Faso	99	100	13
Cameroon	0	1	42
Ecuador	55	86	85
Ethiopia	-	-	-
The Gambia	16	5	89
Georgia	92	92	91
Ghana	25	22	23
Indonesia	93	82	-
Kenya	100	100	100
Liberia	95	95	95
Madagascar	18	15	16
Malawi	-	39	33
Maldives	0	56	64
Mauritania	-	-	-
Mongolia	93	16	90
Namibia	-	45	70
Nepal	-	22	-
Niger	11	12	-
Nigeria	83	100	100
Pakistan	80	80	33
Paraguay	-	-	1
Philippines	92	-	-
Rwanda	-	-	100
Senegal	22	26	-
Sierra Leone	-	90	90
Solomon Islands	10	90	89
Tanzania	-	-	-

Togo	84	62	93
Uganda	23	100	100
Zambia	25	-	20

Annex 1.3: Percent total personal income tax (PIT) withheld, 2020-22

Source: ISORA, 2022

	Value of outstanding VAT credits (% of VAT collected) 2022	*Treatment of VAT refunds*
Afghanistan	-	-
Bangladesh	0.00%	Established as 'credit', refunded on request
Benin	-	Automatically paid out
Burkina Faso	-	Paid out, subject to funds
Cameroon	2.69%	Established as 'credit', refunded subject to funds
Ecuador	0.01%	Established as 'credit', refunded subject to funds
Ethiopia	-	-
The Gambia	-	Established as 'credit', refunded subject to funds
Georgia	-	Automatically paid out
Ghana	-	Established as 'credit', refunded subject to funds
Indonesia	-	Automatically paid out
Kenya	3.03%	Paid out, subject to funds
Liberia	-	-
Madagascar	11.10%	Paid out, subject to funds
Malawi	-	Paid out, subject to funds
Maldives	6.74%	Established as 'credit', refunded on request
Mauritania	-	Automatically paid out
Mongolia	0.18%	Established as 'credit', refunded on request
Namibia	-	Automatically paid out
Nepal	7.03%	Established as 'credit', refunded on request
Niger	-	Automatically paid out
Nigeria	1.30%	Established as 'credit', refunded subject to funds
Pakistan	-	Paid out, subject to funds
Paraguay	13.68%	Established as 'credit', refunded on request
Philippines	-	Paid out, subject to funds (2021)
Rwanda	-	Established as 'credit', refunded on request
Senegal	2.82%	Established as 'credit', refunded on request
Sierra Leone	-	Established as 'credit', refunded on request
Solomon Islands	-	-

Tanzania	-	-
Togo	-	Automatically paid out
Uganda	0.23%	Paid out, subject to funds
Zambia	59.32%	Established as 'credit', refunded subject to funds

Annex 1.4: VAT refunds, 2022

Source: ISORA, 2022

Country	*On-time filing rate % - CIT*		*On-time payment rate % - CIT*		*On-time filing rate % - PIT*		*On-time payment rate % - PIT*		*On-time filing rate % - VAT*		*On-time payment rate % - VAT*		*On-time filing rate % - Employers that withhold tax from employees*		*On-time payment rate % - Employers that withhold taxfrom employees*	
	2020	2022	2020	2022	2020	2022	2020	2022	2020	2022	2020	2022	2020	2022	2020	2022
Afghanistan	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bangladesh	31.2%	43.0%	-	81.1%	36.8%	63.2%	-	81.3%	49.2%	77.7%	-	80.9%	-	30.6%	-	80.8%
Benin	66.4%	85.2%	98.8%	-	66.4%	76.4%	68.6%	-	71.8%	68.2%	94.0%	73.0%	67.1%	64.6%	91.3%	-
Burkina Faso	24.5%	60.4%	14.8%	-	49.1%	21.1%	70.9%	-	61.9%	67.4%	66.8%	-	53.7%	60.4%	63.4%	-
Cameroon	50.9%	-	-	-	50.9%	-	-	-	50.9%	-	-	-	-	-	-	-
Ecuador	44.7%	64.0%	83.7%	88.0%	40.1%	45.4%	63.7%	67.5%	67.3%	69.8%	90.9%	77.8%	22.4%	54.5%	89.4%	28.5%
Ethiopia	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
The Gambia	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Georgia	76.3%	95.3%	91.3%	93.4%	79.6%	88.1%	95.8%	94.2%	89.6%	94.3%	99.2%	93.2%	62.6%	86.6%	97.5%	93.9%
Ghana	82.2%	55.3%	90.4%	78.9%	49.0%	56.0%	85.9%	69.6%	87.0%	75.9%	100.0%	-	84.0%	78.4%	94.8%	91.1%
Indonesia	60.2%	53.7%	87.7%	85.5%	97.8%	61.7%	83.6%	78.2%	-	-	80.4%	80.1%	-	-	84.8%	85.0%
Kenya	40.5%	35.4%	93.5%	80.7%	28.1%	28.0%	100.0%	100.0%	72.7%	96.1%	73.1%	94.2%	47.3%	58.0%	64.7%	95.1%
Liberia	6.0%	4.1%	95.3%	68.1%	4.0%	0.1%	96.5%	0.1%	-	-	-	-	18.1%	8.4%	80.7%	86.4%
Madagascar	65.5%	4.4%	84.7%	82.7%	29.8%	0.1%	92.8%	92.5%	48.4%	6.4%	60.6%	0.9%	56.8%	5.6%	53.9%	2.2%
Malawi	36.5%	2.9%	-	-	66.3%	28.5%	-	-	81.5%	669.7%	-	-	-	725.0%	-	-
Maldives	42.9%	60.0%	86.6%	77.9%	40.2%	58.0%	71.6%	71.1%	65.0%	63.2%	67.5%	75.4%	80.6%	90.4%	82.1%	84.9%
Mauritania	-	38.5%	-	93.5%	-	31.2%	-	56.2%	-	52.0%	-	39.0%	-	2.3%	-	34.7%
Mongolia	61.1%	64.7%	86.0%	75.3%	31.2%	77.2%	80.4%	91.0%	84.6%	72.8%	48.4%	62.4%	70.5%	68.0%	89.5%	78.4%
Namibia	2.0%	16.7%	-	-	38.8%	11.7%	-	-	63.4%	38.6%	-	-	73.4%	30.1%	-	-
Nepal	32.4%	42.8%	226.2%	-	48.3%	-	226.2%	-	39.3%	59.4%	551.7%	-	104.2%	-	332.6%	-
Niger	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nigeria	-	90.2%	-	95.1%	-	59.8%	-	98.9%	-	81.9%	-	95.1%	-	92.2%	-	98.9%

akistan	-	39.6%	-	-	-	58.3%	-	-	-	70.4%	70.0%	-	37.7%	-	-	-
ara-uay	56.1%	40.1%	82.6%	-	71.7%	65.1%	75.5%	-	67.6%	53.9%	66.8%	-	-	-	-	-
hilip-nes	-	-	0.0%	-	-	-	0.0%	-	-	-	0.0%	-	-	-	0.0%	-
wanda	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
enegal	5.6%	7.2%	-	-	2.7%	5.4%	-	-	11.4%	9.4%	-	-	73.2%	16.2%	-	-
erra eone	45.3%	31.5%	-	101.8%	45.0%	6.2%	-	34.2%	89.0%	56.6%	-	90.6%	64.0%	55.8%	-	21.0%
olomon lands	-	67.1%	40.0%	-	97.2%	33.3%	-	-	-	-	-	-	96.0%	47.4%	-	-
anzania	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ogo	-	67.9%	90.0%	46.9%	-	74.0%	85.8%	76.3%	98.9%	53.4%	-	78.3%	-	67.5%	87.4%	26.2%
ganda	32.6%	27.0%	66.5%	95.0%	2.9%	7.6%	31.9%	14.5%	75.4%	67.5%	47.7%	72.3%	62.0%	54.1%	97.5%	79.1%
ambia	40.4%	12.9%	15.2%	75.5%	-	12.9%	-	-	75.8%	55.2%	36.2%	57.0%	66.9%	3.9%	27.2%	62.5%
verage	**43.0%**	**44.4%**	**79.6%**	**82.5%**	**46.5%**	**40.4%**	**83.1%**	**68.4%**	**67.5%**	**89.1%**	**97.1%**	**71.4%**	**63.4%**	**81.0%**	**89.8%**	**65.5%**

Annex 1.5: On-time filing and payment rates, 2020 and 2022

Source: ISORA, 2022

	2020			2023		
	PIT	*CIT*	*VAT*	*PIT*	*CIT*	*VAT*
Afghanistan						
Bangladesh						
Benin						
Burkina Faso						
Cameroon						
Ecuador				X		X
Ethiopia						
The Gambia						
Georgia			X			X
Ghana						X
Indonesia						X
Kenya		X	X	X	X	X
Liberia		X	X			
Madagascar			X			X
Malawi						
Maldives						
Mauritania						
Mongolia			X			
Namibia						
Nepal						
Niger						
Nigeria						
Pakistan				X	X	X
Paraguay	X	X	X			
Philippines				X	X	X
Rwanda			X			X
Senegal			X	X	X	X
Sierra Leone						
Solomon Islands						

Tanzania						
Togo						
Uganda						
Zambia				X	X	X

Annex 1.6: ATI partner countries that have conducted tax gap analysis, 2020 and 2023

Source: 2023 ATI Monitoring Survey

	Closing stock of tax arrears, 2020	*Closing stock of tax arrears, 2022*	*Change over time*
Afghanistan	-	-	-
Bangladesh	-	50.2%	-
Benin	0.0%	8.0%	8.0%
Burkina Faso	73.3%	-	-
Cameroon	39.1%	27.3%	-11.8%
Ecuador	39.3%	35.2%	-4.1%
Ethiopia	-	-	-
The Gambia	-	-	-
Georgia	39.6%	22.7%	-16.9%
Ghana	14.6%	3.6%	-11.0%
Indonesia	6.5%	3.9%	-2.6%
Kenya	132.6%	59.9%	-72.7%
Liberia	65.6%	-	-
Madagascar	22.3%	29.0%	6.7%
Malawi	42.9%	32.4%	-10.5%
Maldives	194.6%	65.9%	-128.8%
Mauritania	-	-	-
Mongolia	46.1%	36.8%	-9.3%
Namibia	12.2%	170.3%	158.1%
Nepal	17.5%	9.6%	-7.8%
Niger	41.0%	55.2%	14.2%
Nigeria	16.6%	11.0%	-5.5%
Pakistan	38.7%	31.3%	-7.3%
Paraguay	5.8%	0.7%	-5.0%
Philippines	21.2%	-	-
Rwanda	20.2%	26.4%	6.3%
Senegal	15.7%	13.8%	-1.9%
Sierra Leone	0.6%	8.0%	7.4%
Solomon Islands	1.6%	514.2%	512.6%
Tanzania	-	-	-

Togo	5.2%	7.2%	2.1%
Uganda	22.2%	29.9%	7.7%
Zambia	107.4%	118.5%	11.1%
Average	38.6%	52.4%	13.8%

Annex 1.7: Closing stock of tax arrears at year end, 2020 and 2022

Source: ISORA, 2022

	ODA for DRM (USD millions)				
ATI Partner Countries	*2020*	*2021*	*2022*	*2023*	*Change 22-23*
Tanzania	14.3	8.2	6.8	10.0	3.3
Nigeria	0.9	2.5	1.0	3.2	2.2
Ecuador	0.2	0.2	0.4	2.6	2.2
Malawi	1.6	3.0	1.6	3.3	1.7
Senegal	1.6	4.4	1.6	2.7	1.1
Bangladesh	0.9	1.4	1.2	2.3	1.1
Solomon Islands	0.7	2.4	1.6	2.6	1.0
Niger	12.9	13.7	1.5	2.4	0.9
Nepal	0.9	0.7	0.8	1.6	0.9
Paraguay	2.1	1.7	2.2	2.9	0.7
Benin	4.2	5.1	3.2	3.8	0.7
Georgia	0.6	0.5	0.5	1.1	0.6
Liberia	3.2	2.4	0.6	1.0	0.5
Sierra Leone	0.9	1.5	0.3	0.6	0.3
Ethiopia	5.1	3.1	1.2	1.4	0.2
Gambia	0.0	0.7	1.1	1.2	0.2
Madagascar	1.1	1.4	1.1	1.2	0.1
Togo	1.1	1.2	0.9	1.0	0.1
Cameroon	5.4	8.2	3.3	3.2	-0.1
Kenya	0.9	1.4	3.1	3.0	-0.1
Namibia	1.2	1.4	0.6	0.4	-0.1
Maldives	0.2	0.1	0.4	0.3	-0.2
Zambia	4.0	4.0	4.8	4.6	-0.3
Mauritania	1.6	1.2	1.1	0.7	-0.4
Ghana	10.8	17.8	5.7	5.2	-0.4
Rwanda	3.9	4.8	2.6	1.9	-0.6
Pakistan	3.1	3.9	3.7	2.9	-0.9
Mongolia	0.0	2.4	3.0	1.4	-1.5
Philippines	3.8	3.3	2.8	1.2	-1.6

Uganda	4.2	9.9	5.5	3.6	-1.9
Burkina Faso	2.9	3.7	5.4	1.3	-4.1
Indonesia	57.8	6.8	48.5	5.0	-43.5
Afghanistan	27.5	11.1	0.0	0.0	0.0

Annex 2.1: Recipients of ODA for DRM: ATI Partner countries, 2020-2023

	ODA for DRM (USD millions)			*Sixth peer review (2023)*			
	Number of tax agreements	*Number compliant with minimum standard (Action 6 BEPS)*	*% compliant*	*Number of tax agreements*	*Number compliant with minimum standard (Action 6 BEPS)*	*% compliant*	*Implementation issues raised*
Australia	45	22	48.89%	45	29	64.44%	No jurisdiction has raised any concerns about their agreements with Australia.
Belgium	95	39	41.05%	95	55	57.89%	No jurisdiction has raised any concerns about their agreements with Belgium.
Canada	94	36	38.30%	94	50	53.19%	No jurisdiction has raised any concerns about their agreements with Canada.
Denmark	72	30	41.67%	71	41	57.75%	No jurisdiction has raised any concerns about their agreements with Denmark.
Finland	73	36	49.32%	74	48	64.86%	No jurisdiction has raised any concerns about their agreements with Finland.
France	119	41	34.45%	120	59	49.17%	No jurisdiction has raised any concerns about their agreements with France.
Germany	95	4	4.21%	94	12	12.77%	23 countries have requested that Germany implement the minimum standard to their tax agreements.
Ireland	73	40	54.79%	74	55	74.32%	No jurisdiction has raised any concerns about their agreements with Ireland.
Italy	100	2	2.00%	103	4	3.88%	4 countries have requested that Italy implement the minimum standard to their tax agreements. Italy has developed a plan to implement the minimum standards with these 4 countries.
South Korea	94	41	43.62%	94	57	60.64%	No jurisdiction has raised any concerns about their agreements with Korea. 1 country has requested that Korea implement the minimum standard to their tax agreement
LuxemburgLuxembourg	83	46	55.42%	84	62	73.81%	No jurisdiction has raised any concerns about their agreements with Luxembourg.
Netherlands	94	45	47.87%	94	59	62.77%	No jurisdiction has raised any concerns about their agreements with the Netherlands.
Norway	85	21	24.71%	84	26	30.95%	28 countries have requested that Norway implement the minimum standard to their tax agreements. Norway has plans to implement the minimum standard in 23 of these agreements.

Slovak Republic	69	32	46.38%	70	41	58.57%	No jurisdiction has raised any concerns about their agreements with the Slovak Republic. 3 countries have requested that the Slovak Republic implement the minimum standard to their tax agreements.
Slovenia	59	34	57.63%	60	42	70.00%	No jurisdiction has raised any concerns about their agreements with Slovenia.
Sweden	81	3	3.70%	83	9	10.84%	5 countries have requested that Sweden implement the minimum standard to their tax agreements. Sweden is working to finalise its internal procedures for the entry into effect of the MLI. The latter involves the appropriate enactment of a separate, dedicated law reflecting the effects of the MLI with respect to each tax agreement under the MLI. To ensure that the minimum standard is implemented as swiftly as possible, Sweden is concurrently pursuing bilateral negotiations.
Switzerland	107	14	13.08%	108	24	22.22%	31 countries have requested that Switzerland implement the minimum standard to their tax agreements.
UK	131	53	40.46%	132	73	55.30%	No jurisdiction has raised any concerns about their agreements with the United Kingdom.
US	66	0	0.00%	65	0	0.00%	No jurisdiction has raised any concerns about their agreements with the United States.

Annex 3.1: Development partner tax treaty minimum standard compliance (BEPS Action 6)

Source: Prevention of Tax Treaty Abuse – Fourth Peer Review Report on Treaty Shopping (link); Prevention of Tax Treaty Abuse – Sixth Peer Review Report on Treaty Shopping (link).

Country	*First year with data*	*Number of years reported*	*Type of data provided*	*Regularity of reporting*	*GTETI Rank*
Afghanistan	-	-	-	-	106 (Unranked)
Bangladesh	2021	1	Somewhat disaggregated	N/A	106 (Unranked)
Benin	2008	13	Provision level	Irregular	9
Burkina Faso	2015	7	Overall estimates	Regular	48
Cameroon	2017	3	Overall estimates	Regular	41
Ecuador	2005	15	Provision level	Irregular	13
Ethiopia	2017	5	Somewhat disaggregated	Regular	82
Georgia	2018	4	Overall estimates	N/A	21
Ghana	2017	8	Overall estimates	N/A	106 (Unranked)
Indonesia	2016	7	Provision level	Regular	2
Kenya	2017	6	Somewhat disaggregated	Regular	55
Liberia	2015	6	Very disaggregated	Regular	77
Madagascar	2015	7	Overall estimates	Regular	101
Malawi	-	-	-	-	106 (Unranked)
Maldives	2019	3	Somewhat disaggregated	N/A	91
Mauritania	2013	8	Overall estimates	Irregular	32
Mongolia	2013	9	Overall estimates	Regular	90

Namibia	-	-	-	-	106 (Unranked)
Nepal	-	-	-	-	106 (Unranked)
Niger	2011	5	Overall estimates	Irregular	34
Nigeria	2019	6	Overall estimates	Regular	56
Pakistan	2003	19	Provision level	Regular	24
Paraguay	2013	12	Overall estimates	Regular	92
Philippines	2012	10	Somewhat disaggregated	Regular	79
Rwanda	2018	4	Provision level	Regular	51
Senegal	2008	13	Somewhat disaggregated	Regular	65
Sierra Leone	2017	6	Somewhat disaggregated	Regular	63
Solomon Islands	-	-	-	-	106 (Unranked)
Tanzania	2000	23	Overall estimates	Regular	105
The Gambia	-	-	-	-	106 (Unranked)
Togo	2019	3	Overall estimates	N/A	68
Uganda	2017	6	Provision level	Regular	45
Zambia	-	-	-	-	106 (Unranked)

Annex 3.3: ATI partner country tax expenditure transparency

Source: Global Tax Expenditures Database (link); Global Tax Expenditures Transparency Index (link).

A2.1 Legal requirement This indicator assesses whether there is a legal requirement explicitly asking for a TE report to be issued, and if such legal requirement defines a specific period when the report needs to be published.	14 ATI partner countries in which the legal basis sets a periodic requirement to report, and specific mention is made to TEs. 2 ATI partner countries in which the legal basis sets a periodic requirement to report, but no specific mention is made to TEs. 1 ATI partner country in which the TE reporting is done following an ad hoc, one-off, legal obligation. 7 ATI partner countries in which the report indicates that there is no legal basis for reporting or the legal basis is not disclosed.
A2.4 Budget cycle integration This indicator assesses if TE information (e.g. policy goals, beneficiaries, revenue forgone estimates) is incorporated into the Executive's Budget Proposal (EBP).	1 ATI partner country in where information beyond the core elements is presented for all tax expenditures 2 ATI partner countries where the core information is presented for all tax expenditures. 9 ATI partner countries where information is presented, but it excludes some core elements or some tax expenditures. 12 ATI partner countries where information related to tax expenditures is not presented.
A4.1 Policy objective This indicator assesses the extent (share of total revenue forgone) up to which TE policy objectives are disclosed.	6 ATI partner countries where the report includes information on TE policy objectives by TE provision, for all TEs. 2 ATI partner countries where the report includes information on TE policy objectives by TE provision, for most TEs 2 ATI partner countries where the report includes information on TE policy objective by TE provision, for many TEs 5 ATI partner countries where the report includes information on TE policy objective by TE provision, for some TEs / OR / The report only includes information on the TE policy objectives for groups of TE provisions without specifying policy objectives by TE. 9 ATI partner countries where the TE report does not include information on TE policy objective.
A4.2 Type of tax expenditure This indicator assesses the extent to which the type of tax as well as the type of TE (e.g. deduction, tax credit, reduced rate, deferral, etc.) are specified for each TE.	12 ATI partner countries where the report includes information on the type of tax and the TE mechanism used, by TE provision. 6 ATI partner countries where TEs are presented by type of tax and for some types of tax, the different types of TE mechanisms are specified (if any). 4 ATI partner countries where TEs are presented by type of tax without indicating the types of TEs available within or TEs are presented by type of TE but relevant taxes are not always specified. 2 ATI partner countries where TEs are assessed in bulk, without differentiating the types of taxes or TEs.
A4.3 Beneficiaries This indicator measures whether the TE report provides information regarding the beneficiaries of TE provisions, both looking into the number of beneficiaries as well as the targeted beneficiary groups or intended beneficiaries.	0 ATI partner countries where the report includes information on the number of beneficiaries, for ALL TEs AND target groups are specified, by TE provision. 1 ATI partner country where the report includes information on the number of beneficiaries, for most TEs and target groups are specified, by TE provision. 1 ATI partner country where the report includes information on the number of beneficiaries, for some TEs and target groups are specified, by TE provision. 15 ATI partner countries where the report only includes some information on target groups, but no numbers of beneficiaries are provided. 7 ATI partner countries where the TE report does not include information on beneficiaries.

A4.4 Timeframe This indicator assesses if there is information on the timeframe of TE provisions, e.g. implementation date, sunset clause (expiry date), timeline with relevant changes, etc.	2 ATI partner countries for which the TE report includes information on applicable timeframes, by TE provision. 4 ATI partner countries for which the TE report provides some indications of TE timeframes, inconsistently. 18 ATI partner countries for which no indications of applicable timeframes are provided in the TE report.
A5.1 Disaggregation of revenue forgone This indicator assesses the share of total revenue forgone estimates provided at the individual TE provision level, or the provision of overall estimates, e.g. grouped by type of tax or policy goal.	10 ATI partner countries in which estimates are provided by TE for all types of taxes. 3 ATI partner countries in which estimates are provided by TE for most types of taxes and with aggregates for other types of tax. 0 ATI partner countries in which estimates are provided by TE for some types of taxes and with aggregates for other types of tax. 2 ATI partner countries in which estimates are aggregated by 3 or 4 out of 4 aggregation categories. 8 ATI partner countries in which estimates are aggregated by 1 or 2 out of 4 aggregation categories. 1 ATI partner country in which only a total estimate of revenue forgone is reported.
A5.2 Backward revenue forgone This indicator assesses the extent to which backward revenue forgone estimates are provided in the latest TE report.	4 ATI partner countries where backward estimates covering five (5) or more fiscal years are provided in the report. 5 ATI partner countries where backward estimates covering four (4) fiscal years are provided in the report. 3 ATI partner countries where backward estimates covering three (3) fiscal years are provided in the report. 5 ATI partner countries where backward estimates covering two (2) fiscal years are provided in the report. 6 ATI partner countries where backward estimates covering only one year are provided in the report. 1 ATI partner country where no backward estimates are provided in the report.
A5.3 Forward revenue forgone This indicator assesses the extent to which projections of future revenue forgone are provided in the latest TE report.	1 ATI partner country where forward estimates covering five (5) or more fiscal years are provided in the report. 1 ATI partner country where forward estimates covering four (4) fiscal years are provided in the report. 3 ATI partner countries where forward estimates covering three (3) fiscal years are provided in the report. 0 ATI partner countries where forward estimates covering two (2) fiscal years are provided in the report. 3 ATI partner countries where forward estimates covering only one year are provided in the report. 16 ATI partner countries where no forward estimates are provided in the report.
A5.4 TE evaluation framework This indicator captures if the report introduces the TE evaluation framework or, if the framework is not discussed in the report directly, includes a reference to an external framework document.	0 ATI partner countries where information on both ex-ante and ex-post TE evaluation frameworks is contained or clearly referenced in the report. 3 ATI partner countries where information on either ex-ante or ex-post TE evaluation frameworks is contained or clearly referenced in the report. 21 ATI partner countries where information on TE evaluation frameworks is not contained or clearly referenced in the report.

Annex 3.4: ATI partner country GTETI Indicators

Source: Global Tax Expenditures Transparency Index (link).

AEOI	*Signatory to CRS MCAA*	*# Activated AEOI relationships under CRS MCAA (2020)*	*# Activated AEOI relationships under CRS MCAA (2023)*
Australia	Yes	78	86
Belgium	Yes	50	59
Canada	Yes	67	76
Denmark	Yes	47	57
Finland	Yes	49	58
France	Yes	50	54
Germany	Yes	49	57
Ireland	Yes	48	58
Italy	Yes	48	58
South Korea	Yes	76	87
Luxemburg	Yes	50	59
Netherlands	Yes	47	56
Norway	Yes	77	88
Slovak Republic	Yes	49	59
Slovenia	Yes	50	59
Sweden	Yes	50	56
Switzerland	Yes	51	60
UK	Yes	71	83
US	-	NA	NA
Afghanistan	-	NA	NA
Bangladesh	-	NA	NA
Benin	-	NA	NA
Burkina Faso	-	NA	NA
Cameroon	Yes (2024)	NA	NA
Ecuador	Yes	68	82
Ethiopia	-	NA	NA
Georgia	Yes	NA	46
Ghana	Yes	72	80
Indonesia	Yes	76	85

Kenya	Yes	NA	71
Liberia	Yes	NA	NA
Madagascar	-	NA	NA
Malawi	-	NA	NA
Maldives	Yes	NA	71
Mauritania	-	NA	NA
Mongolia	-	NA	NA
Namibia	-	NA	NA
Nepal	-	NA	NA
Niger	-	NA	NA
Nigeria	Yes	NA	80
Pakistan	Yes	68	76
Paraguay	-	NA	NA
Philippines	-	NA	NA
Rwanda	Yes	NA	NA
Senegal	Yes (2024)	NA	NA
Sierra Leone	-	NA	NA
Solomon Islands	-	NA	NA
Tanzania	-	NA	NA
The Gambia	-	NA	NA
Togo	-	NA	NA
Uganda	Yes	NA	NA
Zambia	-	NA	NA

Annex 3.5: Activated AEoI relationships

Source: OECD Global Forum on Transparency and Exchange of Information for Tax Purposes, Automatic Exchange Portal (link)

Country	*Amended Mutual Administrative Assistance Convention in force*	*Compliant in overall rating of EOIR requirements from peer review R2*	*A1*	*A2*	*A3*	*B1*	*B2*	*C1*	*C2*	*C3*	*C4*	*C5*	*Round 2 peer review*
Australia	In force	Largely Compliant	Partially Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2017
Belgium	In force	Largely Compliant	Largely Compliant	Compliant	Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Largely Compliant	Compliant	Compliant	2018
Canada	In force	Largely Compliant	Partially Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2017
Denmark	In force	Largely Compliant	Partially Compliant	Compliant	Partially Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2017
Finland	In force	Largely Compliant	Partially Compliant	Compliant	Partially Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2022
France	In force	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2018
Germany	In force	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2017
Ireland	In force	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2017
Italy	In force	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2017
South Korea	In force	Largely Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2020
Luxemburg	In force	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2019
Netherlands	In force	Largely Compliant	Partially Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2019
Norway	In force	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2017

Slovak Republic	In force	Largely Compliant	Partially Compliant	Largely Compliant	Partially Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2020
Slovenia	In force	Largely Compliant	Largely Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2022
Sweden	In force	Largely Compliant	Largely Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2024
Switzerland	In force	Largely Compliant	Partially Compliant	Compliant	Largely Compliant	Compliant	Largely Compliant	Largely Compliant	Compliant	Partially Compliant	Largely Compliant	Largely Compliant	2020
UK	In force	Largely Compliant	Largely Compliant	Largely Compliant	Compliant	Partially Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2018
US	Signed	Largely Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Largely Compliant	2018
Afghanistan	-	Not yet reviewed											
Bangladesh	-	Not yet reviewed											
Benin	In force	Not yet reviewed											
Burkina Faso	In force	Largely Compliant	Partially Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2016 (Round 1)
Cameroon	In force	Largely Compliant	Largely Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2024
Ecuador	In force	Largely Compliant	Partially Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2024
Ethiopia	-	Not yet reviewed											
Georgia	In force	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2024

Ghana	In force	Partially Compliant	Partially Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Non-Compliant	2018
Indonesia	In force	Largely Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2018
Kenya	In force	Largely Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2024
Liberia	In force	Partially Compliant	Partially Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Largely Compliant	Compliant	Partially Compliant	Compliant	Largely Compliant	2020
Madagascar	Signed	Not yet reviewed											
Malawi	-	Not yet reviewed											
Maldives	In force	Not complete, Phase 1 only											2022
Mauritania	In force	Not complete, Phase 1 only											2023
Mongolia	In force	Not yet reviewed											
Namibia	In force	Not yet reviewed											
Nepal	-	Not yet reviewed											
Niger	-	Not yet reviewed											
Nigeria	In force	Largely Compliant	Partially Compliant	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	2023
Pakistan	In force	Largely Compliant	Partially Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Largely Compliant	2023
Paraguay	In force	Not complete, Phase 1 only											2023

Philip-pines	Signed	Largely Compliant	Partially Compli-ant	Largely Com-pliant	Compli-ant	Compli-ant	Largely Compli-ant	Largely Compli-ant	Com-pliant	Compli-ant	Compli-ant	Largely Compliant	2018
Rwanda	In force	Not yet reviewed											
Senegal	In force	Largely Compliant	Largely Compli-ant	Com-pliant	Compli-ant	Compli-ant	Compli-ant	Compli-ant	Com-pliant	Compli-ant	Compli-ant	Largely Compliant	2016 (Round 1)
Sierra Leone	-	Not yet reviewed											
Solomon Islands	-	Not yet reviewed											
Tanzania	-	Not com-plete, Phase 1 only											2021
The Gam-bia	-	Not yet reviewed											
Togo	Signed	Not com-plete, Phase 1 only											2023
Uganda	In force	Largely Compliant	Largely Compli-ant	Largely Com-pliant	Compli-ant	Compli-ant	Compli-ant	Compli-ant	Com-pliant	Compli-ant	Compli-ant	Compliant	2016 (Round 1)
Zambia	-	Not yet reviewed											

Annex 3.6: Exchange of Information on Request (EoIR)

Source: Global Forum on Transparency and Exchange of Information for Tax Purposes, Compliance ratings following peer reviews against the standard of EOIR (link).

	2020					2022				
Country	**Indicator 3**	**Indicator 4**	**Indicator 5**	**Indicator 6**	**Are bearer shares available?**	**Indicator 3**	**Indicator 4**	**Indicator 5**	**Indicator 6**	**Are bearer shares available?**
Australia	100	50	100	100	No, bearer shares are not available/not circulating.	100	100	100	100	No, bearer shares are not available/not circulating.
Belgium	50	50	100	100	No, bearer shares are not available/not circulating.	75	100	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Canada	100	100	100	100	No, bearer shares are not available/not circulating.	100	100	100	100	No, bearer shares are not available/not circulating.
Denmark	50	50	70	50	No, bearer shares are always immobilised/registered by a public authority.	50	50	100	100	No, bearer shares are always immobilised/registered by a public authority.
Finland	100	100	95	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	75	100	95	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
France	50	100	100	100	No, bearer shares are always immobilised/registered by a public authority.	50	100	70	50	No, bearer shares are always immobilised/registered by a public authority.
Germany	75	100	60	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	75	100	95	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Ireland	40	100	100	10	No, bearer shares are not available/not circulating.	40	100	100	10	No, bearer shares are not available/not circulating.
Italy	65	50	95	90	No, bearer shares are not available/not circulating.	90	50	100	100	No, bearer shares are not available/not circulating.
South Korea	100	100	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	100	100	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Luxemburg	75	100	75	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	75	100	70	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Netherlands	100	95	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	75	95	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Norway	65	50	50	85	No, bearer shares are not available/not circulating.	65	100	100	80	No, bearer shares are not available/not circulating.

Slovak Republic	65	40	40	100	No, bearer shares are always immobilised/registered by a public authority.	75	40	0	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Slovenia	65	50	5	55	No, bearer shares are always immobilised/registered by a public authority.	40	40	13	50	No, bearer shares are always immobilised/registered by a public authority.
Sweden	40	50	100	100	No, bearer shares are not available/not circulating.	40	40	100	100	No, bearer shares are not available/not circulating.
Switzerland	100	88	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	100	88	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
UK	50	100	100	50	No, bearer shares are not available/not circulating.	40	100	100	50	No, bearer shares are not available/not circulating.
US	100	100	100	100	No, bearer shares are not available/not circulating.	75	100	100	100	No, bearer shares are not available/not circulating.
Afghanistan	-	-	-	-	-	-	-	-	-	-
Bangladesh						100	50	100	100	No, bearer shares are not available/not circulating.
Benin	-	-	-	-	-	-	-	-	-	-
Burkina Faso	-	-	-	-	-	-	-	-	-	-
Cameroon	100	50	100	100	No, bearer shares are always immobilised/registered by a public authority.	100	50	100	100	No, bearer shares are always immobilised/registered by a public authority.
Ecuador	0	50	55	5	No, bearer shares are not available/not circulating.	0	50	50	0	No, bearer shares are not available/not circulating.
Ethiopia	-	-	-	-		-	-	-	-	-
Georgia	-	-	-	-		-	-	-	-	-
Ghana	40	50	0	100	No, bearer shares are not available/not circulating.	15	50	0	100	No, bearer shares are not available/not circulating.
Indonesia	75	50	100	100	Yes, but status is unknown.	75	50	100	100	Yes, but status is unknown.
Kenya	75	50	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	0	100	100	100	No, bearer shares are not available/not circulating.

Liberia	100	50	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	100	50	100	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Madagascar	-	-	-	-		-	-	-	-	-
Malawi	-	-	-	-		-	-	-	-	-
Maldives						100	50	100	100	No, bearer shares are not available/not circulating.
Mauritania	-	-	-	-	-	-	-	-	-	-
Mongolia	-	-	-	-		-	-	-	-	-
Namibia	-	-	-	-		100	50	0	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.
Nepal	-	-	-	-		-	-	-	-	-
Niger	-	-	-	-	-	-	-	-	-	-
Nigeria						75	50	100	100	No, bearer shares are not available/not circulating.
Pakistan	100	50	0	100	No, bearer shares are not available/not circulating.	100	50	100	100	Yes, but status is unknown.
Paraguay	50	50	100	100	No, bearer shares are not available/not circulating.	0	50	100	100	No, bearer shares are not available/not circulating.
Philippines	25	50	100	100	No, bearer shares are not available/not circulating.	15	50	100	100	No, bearer shares are not available/not circulating.
Rwanda	90	50	0	100	No, bearer shares are not available/not circulating.	90	50	100	100	No, bearer shares are not available/not circulating.
Senegal	-	-	-	-		-	-	-	-	-
Sierra Leone	-	-	-	-		-	-	-	-	-
Solomon Islands	-	-	-	-		-	-	-	-	-
Tanzania	100	50	0	100	Yes, unregistered bearer shares are available/circulating or registered by a private custodian.	65	50	0	100	No, bearer shares are not available/not circulating.
The Gambia	100	50	100	100	No, bearer shares are not available/not circulating.	100	50	100	100	No, bearer shares are not available/not circulating.

Togo	-	-	-	-	-	-	-	-	-	-
Uganda	-	-	-	-	-	-	-	-	-	-
Zambia	-	-	-	-	-	-	-	-	-	-

Annex 3.7: beneficial ownership registers and bearer shares."

Source: Tax Justice Network, Financial Secrecy Index 2022 (HYPERLINK "https://fsi.taxjustice.net/"link).

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