GLOBAL FORUM ON
TRANSPARENCY AND EXCHANGE OF INFORMATION FOR TAX PURPOSES

Tax Transparency in Africa 2024

Africa Initiative Progress Report

African Union

AFRICAN TAX ADMINISTRATION FORUM
FORUM SUR L'ADMINISTRATION FISCALE AFRICAINE

OECD
BETTER POLICIES FOR BETTER LIVES

The Africa Initiative, its members and partners

Given the size of illicit financial flows from African countries, and recognising the potential of tax transparency and exchange of information to fight them and to raise resources for development, African countries member of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) decided to create an African–focused programme in 2014: the **Africa Initiative**. The objective was to unlock the potential of tax transparency and exchange of information (EOI) for Africa by ensuring that African countries are equipped to exploit the improvements in global transparency to better tackle tax evasion and mobilise domestic revenues.

Focusing on Africa enables the identification of specific needs and priorities of African countries in EOI and the provision of tailored support to address them. The Africa Initiative's work fits into a broader agenda, as tax transparency is an opportunity to stem illicit financial flows and increase domestic resource mobilisation, which are central to the African Union's Agenda 2063 and the Sustainable Development Goals.[1]

The Africa Initiative is a partnership between the Global Forum, its African members and several continental, regional and international organisations and development partners. With the Democratic Republic of the Congo and Zambia recently joining the Global Forum, the Africa Initiative now counts 39 members and remains open to all African countries member of the Global Forum.[2] It is supported by 17 partners and donors.

1. More information on the United Nations Sustainable Development Goals is available at https://sdgs.un.org/goals.
2. Upon joining the Global Forum, African countries become members of the Africa Initiative.

13th meeting of the Africa Initiative, 6–7 July 2023, Cape Town, South Africa.

The 39 members of the Africa Initiative

Algeria
Angola
Benin
Botswana
Burkina Faso
Cabo Verde
Cameroon
Chad
Republic of the Congo
Democratic Republic of the Congo
Côte d'Ivoire
Djibouti
Egypt
Eswatini
Gabon
Ghana
Guinea
Kenya
Lesotho
Liberia
Madagascar
Mali
Mauritania
Mauritius
Morocco
Namibia
Niger
Nigeria
Rwanda
Senegal
Seychelles
Sierra Leone
South Africa
Tanzania
Togo
Tunisia
Uganda
Zimbabwe
Zambia

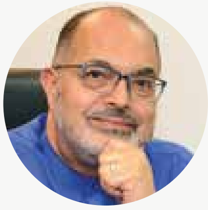
GOVERNANCE OF THE AFRICA INITIATIVE

Initially set up for a period of three years (2015–2017), the Africa Initiative has been renewed in 2017, 2020 and 2023 for a three–year period. In 2020, the Initiative set up a new governance framework effective in 2021, involving the election of a Chair and Vice–Chair to steer its work and a clear set of goals were agreed upon. Building on the lessons learnt from the first year of implementation, the new governance framework was modified in December 2022, with two Co–Chairs for a two–year period.

Leadership of the Africa Initiative since 2021

2021–2022

CHAIR
Githii Mburu
Kenya
Commissioner General, Kenya Revenue Authority



VICE–CHAIR
Edward Kieswetter
South Africa
Commissioner, South African Revenue Service

2023–2024

CO–CHAIR
Dr Philippe Kokou Tchodie
Togo
Commissioner General, Togolese Revenue Office

CO–CHAIR
Edward Kieswetter
South Africa
Commissioner, South African Revenue Service

Partners and donors of the Africa Initiative

African Development Bank Group

African Tax Administration Forum

African Union Commission

Cercle de réflexion et d'échange des dirigeants des administrations fiscales

Commonwealth Association of Tax Administrators

European Union

France

Germany

International Finance Corporation (World Bank Group)

Ireland

Netherlands

Norway

Sweden

Switzerland

United Kingdom

West African Tax Administration Forum

World Bank Group

THE YAOUNDÉ DECLARATION

The "Yaoundé Declaration" was signed during a ministerial meeting held on the sidelines of the 2017 Global Forum plenary meeting in Yaoundé, Cameroon, to promote the objectives of the Africa Initiative. The Declaration calls for strengthened efforts to curb tax evasion through transparency and EOI. The Yaoundé Declaration now counts 33 African countries and the African Union Commission as signatories.

The 34 signatories of the Yaoundé Declaration, as on 31 December 2023

More information on the Yaoundé Declaration is available at https://www.oecd.org/tax/transparency/what-we-do/technical-assistance/the-yaounde-declaration.htm.

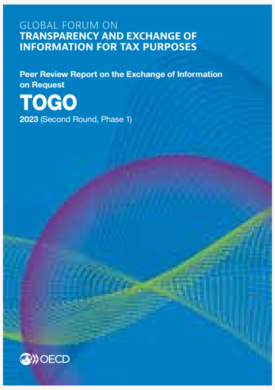
WORK PROGRAMME OF THE AFRICA INITIATIVE

At the onset, the Africa Initiative agreed on an ambitious work programme to develop and consolidate a culture of transparency and EOI in African countries, and to progress towards the implementation of automatic exchange of financial account information (AEOI) under the Common Reporting Standard (CRS). The Initiative's current work programme is based on a three–year mandate, which covers the period 2024–2026. The Africa Initiative builds on the progress achieved by members since 2014 and continues to raise political awareness and to support members to implement the "core stage" of tax transparency and EOI, with an emphasis on beneficial ownership information transparency. The Africa Initiative has also identified "enhanced building blocks" that can be implemented by interested members.

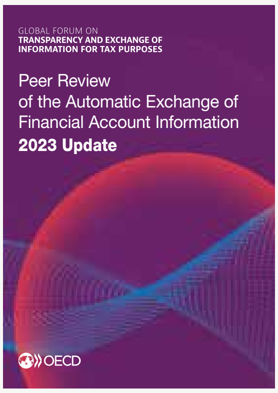
The "**core stage**" encompasses:

- setting up operational EOI units with adequate resources, including delegated competent authority powers and an EOI internal procedure or manual
- defining a clear strategy to use EOI as a tool to improve tax audits, sensitisation of relevant stakeholders and actively increasing the number of requests made to treaty partners
- expanding the network of EOI relationships by joining the Convention on Mutual Administrative Assistance in Tax Matters
- receiving a satisfactory rating in the second round of the peer review of the standard of transparency and exchange of information on request
- increasing the number of African countries implementing AEOI on a practical timeframe and benefitting from technical support including on confidentiality and data safeguards
- measuring the impact and benefit of EOI through the collection and tracking of statistical information.

The "**enhanced building blocks**" are areas identified as relevant for capacity–building and collaborative activities. These include cross–border assistance in the recovery of tax claims, the effective use of CRS data and the use of EOI data for non–tax purposes.



https://doi.org/10.1787/2219469x



https://doi.org/10.1787/5c9f58ae-en

Members of the Africa Initiative meet twice a year to take stock of their progress and discuss ways of addressing the remaining challenges.

OVERVIEW OF THE TAX TRANSPARENCY STANDARDS

The tax transparency standards – the Standard on Transparency and Exchange of Information on Request (EOIR) and the Standard on Automatic Exchange of Financial Account Information (AEOI) under the Common Reporting Standard (CRS) *(see page 7)* – aim at improving transparency by disclosing legal and beneficial ownership information, as well as accounting and banking information. These standards also seek to improve the access to that information and its effective exchange with foreign treaty partners. By promoting the adoption and implementation of legal and administrative frameworks that ensure the availability of critical information, the tax transparency standards also enable law enforcement authorities to track, detect and sanction the abuse of legal entities and arrangements for other IFFs activities.

Transparency and exchange of information on request

The EOIR standard requires a jurisdiction's competent authority (CA) – usually, the tax authority – to provide, on request, information to another jurisdiction's CA that is foreseeably relevant for conducting a tax investigation and to enforce its tax laws or the provisions of a tax agreement in force between the two jurisdictions.

The EOIR standard is built around three pillars of availability, access and exchange, which form the basis of its Terms of Reference (ToR).[(a)]

A. **Availability of information**: jurisdictions should ensure the availability of (i) legal and beneficial ownership information of all relevant legal entities and arrangements, (ii) accounting records and underlying documents, and (iii) banking information (including information on legal and beneficial owners of accounts).

B. **Access to information**: jurisdictions should have the authority and powers to obtain relevant information for tax purposes, including legal and beneficial ownership, accounting and banking information.

C. **Exchange of information**: jurisdictions should have an international legal basis and mechanisms, and an organisational framework that provides for exchange of information in a timely manner.

All members of the Global Forum are committed to the implementation of the EOIR standard, and the level of compliance with this standard, both in terms of the legal and regulatory framework and the implementation in practice, is assessed under the Global Forum's peer review process to ensure a level playing field.

Automatic exchange of financial account information

The AEOI standard requires financial institutions to apply due diligence rules and periodically report information regarding financial accounts of tax residents of other jurisdictions to their local CAs. Subsequently, the CAs automatically exchange this information with the CAs of other jurisdictions (i.e. the jurisdiction of tax residence of the account holder). The CRS contains details as to the due diligence process that should be applied by financial institutions to determine what accounts are reportable and the items of information that should be exchanged.

All members of the Global Forum are committed to the implementation of the AEOI standard, whilst not all jurisdictions are expected to implement it within a specific deadline, due to time needed for some of them to develop their capabilities. Currently, a total of 126 jurisdictions are committed to exchanging financial account information automatically by 2027 [(b)]

Jurisdictions implementing the AEOI standard undergo a peer review process by the Global Forum. The peer reviews are carried out against the three Core Requirements (CR) of the AEOI ToR[(c)]:

CR 1: jurisdictions should ensure that all reporting financial institutions apply due diligence procedures which are in accordance with the CRS to review the financial accounts they maintain and collect and report the information required by the CRS.

CR 2: jurisdictions should exchange information with all interested appropriate partners[(d)] in accordance with the AEOI standard, in a timely manner, ensuring it is sorted, prepared, validated and transmitted in accordance with the AEOI standard.

CR 3: jurisdictions should keep the information exchanged confidential and properly safeguarded and use it in accordance with the exchange agreement under which it was exchanged.

(a). OECD (2023), *Handbook for Peer Reviews on Transparency and Exchange of Information on Request: Second Round*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/handbook-for-peer-reviews-on-transparency-and-exchange-of-information-on-request.pdf.
(b). This includes jurisdictions that committed to implement the CRS by a specific date in 2024. The status of AEOI commitments is available at https://www.oecd.org/tax/transparency/AEOI-commitments.pdf.
(c). OECD (2018), *The Framework for the full AEOI reviews: the terms of reference*, available at https://www.oecd.org/tax/transparency/documents/terms-of-reference-for-aeoi-reviews.htm.
(d). Interested appropriate partners are those interested in receiving information and that meet the required standards in relation to confidentiality and data safeguards.

Foreword

Agenda 2063: The Africa We Want is Africa's blueprint and master plan for transforming Africa into a prosperous continent based on inclusive growth and sustainable development. The Africa Union (AU) Commission has earmarked the fight against all forms of illicit financial flows (IFFs) as a means of enhancing domestic resource mobilisation (DRM) by African countries, which is critical to the achievement of the aspirations and objectives of Agenda 2063.

Tax transparency and exchange of information (EOI) for tax purposes is recognised as a powerful weapon in fighting tax evasion and other IFFs, in addition to building capacities for raising more revenues domestically. Since 2014, the Africa Initiative has been at the forefront of efforts aimed at unlocking the potential of tax transparency and EOI for African countries.

The *Tax Transparency in Africa Report*, now in its sixth edition, provides concrete evidence of the impact of tax transparency in the fight against the scourge of IFFs from Africa and demonstrates the huge potential offered by the implementation and use of this tool by African tax authorities for the sustainable strengthening of national revenue mobilisation by African countries.

In 2023, seven African countries used EOI to identify over EUR 2.2 billion in additional revenues (tax, interests and penalties) by using information received from other jurisdictions either at their request or automatically. This is more than the total revenues they identified using EOI in the period 2009 to 2022. For the second time since 2009, African countries have sent more requests for information than they received. Since 2009, this is close to EUR 4 billion of additional revenue reported on the continent due to EOI. These are remarkable outcomes to support the development of our countries and the provision of public services to our citizen. And I expect to see even bigger figures in the future, as the continent moves to fully exploiting the transparency and EOI tools to fight IFFs as they mobilise domestic resources.

Commitment to the tax transparency agenda is also increasing with four new members joining the Africa Initiative in 2023, bringing the total number of African countries committed to using tax transparency and EOI to combat IFFs from Africa to 38 as at December 2023. Since then, the Africa Initiative has welcomed its 39th African member. In addition, the number of countries actively requesting information from foreign partners to support their domestic tax investigations and audits and the number of countries committed to start automatic exchange of financial account information by a specific date are also rising in Africa. African countries are also taking steps to participate in the automatic exchange of information on crypto assets. This progress is crucial to equip African tax authorities with the tools and knowledge to effectively tackle classic and new forms of tax evasion. This strong and growing commitment by African countries to tax transparency will certainly help reduce tax non-compliance and illicit behaviours, and increase the tax revenues for the continent as a whole.

In 2023, seven African countries used EOI to identify over EUR 2.2 billion in additional revenues (tax, interests and penalties) by using information received from other jurisdictions either at their request or automatically.

On behalf of the AU Commission, I would like to thank all partners of the Africa Initiative for the support provided to African countries to benefit from the implementation of the tax transparency standards as they mobilise more resources domestically. I would also like to thank all parties involved in the publication of this report which enables African countries to share success stories with their peers and identify areas of common challenges and ways to address them. Finally, I wish to invite all African countries to join the Africa Initiative and unlock the potential of tax transparency and EOI to themselves to self-finance their development programmes and projects.

I reaffirm the AU Commission remains steadfast in its commitment to supporting the Africa Initiative and the work of the Global Forum and other partners to advance tax transparency to combat tax evasion and other forms of IFFs from the continent.

Albert M. Muchanga
Commissioner for Economic Development, Trade, Tourism, Industry and Minerals
African Union Commission

Preface

The *Tax Transparency in Africa 2024: Africa Initiative Progress Report* is the sixth edition of this annual report, which takes stock of the progress made by African countries in tackling tax evasion and other illicit financial flows (IFFs) through enhanced tax transparency and exchange of information (EOI) in 2023. It is a joint publication by the African Union Commission, the African Tax Administration Forum and the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum). It is a key output of the Africa Initiative launched 10 years ago by the Global Forum, its African members, partners and donors, to unlock the potential of EOI for African countries.

Forty–one African countries have provided inputs necessary for the preparation of this report. As in previous editions, the report provides statistical information on the implementation of the tax transparency standards – Standard on Transparency and Exchange of Information on Request (EOIR standard) and the Standard on Automatic Exchange of Financial Account Information (AEOI standard) – and their contribution to domestic resources mobilisation (DRM) in Africa.

The 2024 edition shows the remarkable progress made by African countries. In 2023, two more African countries joined the Global Forum and the global efforts to combat tax evasion through tax transparency and EOI. African countries also intensified the use of established EOI infrastructures to access information held offshore but which is key for resolving tax audits, investigations and other compliance activities with cross–border elements by sending more requests. The number of African countries either implementing the AEOI standard or committed to first exchanges by a specific date is now 12. In addition, two African countries have indicated their intention to implement the Crypto–Asset Reporting Framework (CARF), a dedicated global tax transparency framework which provides for the automatic exchange of information on transactions in crypto–assets in a standardised manner with the jurisdictions of residence of taxpayers on an annual basis.

The report confirms the growing participation of African countries in the implementation and use of EOI is generating additional revenues that would otherwise not have been collected. One of the five African countries that are currently exchanging information automatically identified over EUR 30 million in additional revenues thanks to the use of the financial account data received automatically. Overall, African countries more than doubled the revenues (tax, interest and penalties) identified through offshore tax investigations including EOIR, voluntary disclosure programmes launched in the context of the implementation of AEOI, and effective use of the data received automatically, from a cumulative of EUR 1.69 billion at the end of 2022 to over EUR 3.8 billion was on 31 December 2023 identified by a group of 12 African countries.

This progress is a result of both the growing political buy–in for the tax transparency agenda and the enhanced capacity–building led by a coalition of donors and partners working together under the banner of the Africa Initiative. We take this opportunity to thank all the members, partners and donors of the Africa Initiative for their contribution to advancing the tax transparency agenda in Africa. We remain steadfast in our commitment to help African countries address challenges in implementing and benefitting from the tax transparency standards to combat IFFs, promote tax compliance and enhance DRM.

Edward Kieswetter
Co–Chair of the Africa Initiative
Commissioner, South African Revenue Service

Dr Philippe Kokou Tchodie
Co–Chair of the Africa Initiative
Commissioner General, Togolese Revenue Office

Zayda Manatta
Head of the Secretariat Global Forum on Transparency and Exchange of Information for Tax Purposes

Logan Wort
Executive Secretary African Tax Administration Forum

14th meeting of the Africa Initiative – 28 November 2023, Lisbon, Portugal.

Acknowledgements

The sixth edition of the Tax Transparency in Africa report is jointly published by the African Union Commission, the African Tax Administration Forum and the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum). Prepared by the Global Forum Secretariat[1], the Tax Transparency in Africa 2024 report presents the progress of the Africa Initiative – in which all the 39 African members of the Global Forum participate – and some non–member African countries, for the year 2023.

The Global Forum Secretariat would like to acknowledge with much appreciation the African Development Bank Group (Governance and Economic Reform Department), the *Cercle de Réflexion et d'Échange des Dirigeants des Administrations Fiscales*, the Commonwealth Association of Tax Administrators, the International Finance Corporation, the West African Tax Administration Forum and the World Bank for promoting the tax transparency agenda in Africa.

The Global Forum Secretariat is also immensely grateful to the donors who contribute to the funding of the Africa Initiative and the Global Forum's capacity building to African countries on tax transparency and exchange of information. These include the European Union, France, Germany, Ireland, the Netherlands, Norway, Sweden, Switzerland and the United Kingdom.

Finally, the authors extend special thanks to officials from the ministries of finance and tax administrations of all the 41 African countries, including non–members of the Global Forum, who provided data by responding to the Africa Initiative Survey. The data and responses were analysed and form the basis for the insights presented in the report. Their efforts in gathering the data and their patience in providing further clarifications have been critical to the quality of this report.[2]

1. This report was prepared by the following staff of the Global Forum Secretariat: Clement Migai, Marcelo Miguel, Ogoutchetout Akpaki, Retlotlilwe Mofokeng – a team led by Ervice Tchouata and under the supervision of Hakim Hamadi, Head of the Capacity–Building and Outreach Unit, and Zayda Manatta, Head of the Global Forum Secretariat.
2. In addition to the 41 African countries that provided data, the authors would especially like to thank the following for their specific contributions: Directorate General of Taxes of Cameroon, Directorate General of Taxes of Burkina Faso, Ghana Revenue Authority, Revenue Service Lesotho, the South African Revenue Service and Uganda Revenue Authority.

Contents

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Abbreviations and acronyms

AEOI	Automatic Exchange of Financial Account Information
AfCFTA	African Continental Free Trade Area
AfDB	African Development Bank
AIST	International Association of Treasury Services
AML/CFT	Anti-Money Laundering and Counter Financing of Terrorism
ATAF	African Tax Administration Forum
AU	African Union
CA	Competent Authority
CBO Unit	Capacity Building and Outreach Unit of the Global Forum Secretariat
CRS	Common Reporting Standard
CREDAF	Cercle de Réflexion et d'Échange des Dirigeants des Administrations fiscales
DRM	Domestic Resource Mobilisation
EAC	East African Community
ECOWAS	Economic Community of West African States
EOI	Exchange of information
EOIR	Exchange of Information on Request
EU	European Union
Global Forum	Global Forum on Transparency and Exchange of Information for Tax Purposes
IFC	International Finance Corporation
IFF	Illicit Financial Flows
ISM	Information Security Management
MAAC	Convention on Mutual Administrative Assistance in Tax Matters
OECD	Organisation for Economic Co–operation and Development
Secretariat	Secretariat of the Global Forum on Transparency and Exchange of information for Tax Purposes
TTiA	Tax Transparency in Africa
UNCTAD	United Nations Trade and Development Conference
VAT	Value Added Tax
VDP	Voluntary Disclosure Programme
WAEMU	West African Economic and Monetary Union
WATAF	West African Tax Administration Forum

Executive summary

Tax Transparency in Africa 2024: Africa Initiative Progress Report (TTiA) includes information provided by 41 African countries,* the highest number since the first edition of the report in 2019. It shows exceptional developments on the use of exchange of information for tax purposes (EOI) to support domestic resource mobilisation (DRM) efforts in Africa in 2023, as well as the progress on the two strategic axes of the Africa Initiative: (i) raising political awareness and commitment in Africa, and (ii) developing capacities in African countries in tax transparency and EOI.

EOI made a significant impact on DRM in 2023, confirming that countries that invest in tax transparency and EOI can further benefit from it if the established EOI infrastructures are put to good use by tax authorities. Since 2009, close to EUR 4 billion in additional revenues (tax, interests and penalties) was identified by 12 African countries through offshore tax investigations, including EOIR, AEOI related voluntary disclosure programmes and making effective use of the data received automatically.

* Algeria, Angola, Benin, Botswana, Burkina Faso, Burundi, Cabo Verde, Cameroon, Chad, Comoros, Congo (Republic of the), the Democratic Republic of the Congo, Côte d'Ivoire, Egypt, Eswatini, Gabon, Ghana, Gambia, Guinea, Kenya, Lesotho, Liberia, Madagascar, Mali, Mauritania, Mauritius, Morocco, Namibia, Niger, Nigeria, Rwanda, Senegal, Seychelles, Sierra Leone, South Africa, Tanzania, Togo, Tunisia, Uganda, Zambia and Zimbabwe.

2023 marked a remarkable turning point. One African country reported identifying close to EUR 30 million in additional revenues through the use of financial account data received automatically, while other six reported identifying over EUR 2.2 billion in additional revenues through the use of EOIR. The over EUR 2.2 billion in additional revenue identified in 2023 is more than the total additional revenues cumulatively identified in the period 2009 to 2022 (a total of EUR 1.6 billion as of December 2022). African countries efforts in implementing the tax transparency standards and building a culture of EOI are paying off and the expectations are growing for the years to come.

In 2023, the Africa Initiative, under the leadership of its Co–Chairs and with the support of the Global Forum Secretariat and its partners, continued to raise political awareness on the potential of tax transparency and EOI at the continental, regional and country levels. This included engagements with the African Union Commission, African Union member states, the African Development Bank, the United Nations Economic Commission for Africa, the African Tax Administration Forum (ATAF) and the West African Tax Administration Forum, to garner political buy–in for and increased commitment to tax transparency and EOI as a tool for combating illicit financial flows (IFFs). Further engagements were held with other important partners such as the *Cercle de Réflexion et d'Echange des Dirigeants des Administrations Fiscales* and the World Bank.

These high–level engagements contributed to strengthening collaboration with key international and regional institutions to promote the tax transparency agenda in Africa. It also culminated in new commitments to tax transparency by African countries. Four additional countries – Angola (8 March 2023), Zimbabwe (11 April 2023), Sierra Leone (15 May 2023) and the Democratic Republic of the Congo (1 December 2023) – joined the Global Forum and the Africa Initiative bringing the membership of African countries to 38 as at 31 December 2023.[1]

African countries continued to improve their EOI infrastructures in 2023. Benin completed its domestic ratification process and deposited its instrument of ratification, bringing the MAAC into force. The MAAC also came into force for Burkina Faso, who had deposited its instrument of ratification in December 2022. As at 31 December 2023, 88% of 41 African countries that participated in the survey had delegated the Competent Authority powers and functions to the tax authority, while 71% had established EOI units. Further, 61% had both documented formal procedures for handling EOI requests and put in place tracking systems to monitor the handling of EOI requests and improve the effectiveness of the EOI function.

Importantly, African countries put established EOI infrastructures to good use. The number of African countries sending EOI requests remains 19, as was the case in 2019 and 2022. In aggregate, African countries made the highest number of EOI requests ever and the continent also became a net sender (i.e. the total number of requests sent by African countries exceeded the total number of requests received), for the second time since the launch of the Africa Initiative in 2014: African countries made a total of 888 requests compared to 801 requests received in 2023. Compared to 2022, it is a 40% increase in the number of requests made. Although a handful of countries still accounted for the bulk of EOI activity in Africa in 2023, with four countries accounting for over 84% of all requests sent, and two of them alone accounting for over 70%, there is progress. Two African countries made their first EOI requests and for the first time the number of countries sending more than twenty requests rose from four to eight.

Finally, in response to the call by the Africa Initiative in 2021 for members to take deliberate steps to put in place the essential building blocks for enhancing the use of cross–border assistance in the recovery of tax claims (CBAR), the Global Forum Secretariat published a toolkit on establishing and running an effective CBAR function. Together with ATAF, the Global Forum Secretariat held the first regional workshop for African countries on CBAR. A second workshop for French speaking countries, hosted by the France tax administration, was held jointly with CREDAF and the International Association of Treasury.

This report shows that African countries that have invested in EOI and making active use of the established EOI infrastructures are reaping the benefits of improved tax transparency. It also shows that, in general, older

1. In January 2024, Zambia joined the Global Forum and the Africa Initiative becoming the 39th African member.

Opening of the 13th meeting of the Africa Initiative with the Minister of Finance of South Africa, the Hon. Enoch Godongwana, 6 July 2023, Cape Town , South Africa..

The over EUR 2.2 billion in additional revenue identified in 2023 is more than the total additional revenues cumulatively identified in the period 2009 to 2022.

members of the Global Forum/Africa Initiative are more advanced in establishing and making use of EOI infrastructures than newer members and non–members. This calls for continued support to newer members to establish requisite EOI infrastructures and make use of them. It also calls for continued engagement at the continental, regional and domestic levels to guarantee political buy–in for tax transparency and EOI to ensure that more tax authorities participate in and benefit from tax transparency and EOI work.

Technical assistance was provided to 30 African countries to overcome challenges: 16 countries received comprehensive support and another 11 benefitted from tailored technical assistance to address specific needs. AEOI implementation was also given specific attention, with 11 countries receiving technical assistance to establish the essential AEOI building blocks. In addition, two non–members received pre–membership support to raise political awareness on the potential and relevance of tax transparency for their countries, as well as the benefits and commitments associated with the Global Forum membership. Twenty–three training events were organised in 2023 and delivered to 1 309 officials representing 37 members of the Africa Initiative and non–members. Further, more than 933 additional officials were trained by EOI local trainers who participated in the "Train the Trainer" programme. Finally, 12 African female tax professionals participated in the "Women Leaders in Tax Transparency" programme aimed at promoting female leadership in tax transparency.

Looking ahead, the Africa Initiative will continue to support African countries to make effective use of the established EOI infrastructures to access information relevant for tax audits and investigations, to join the implementation of the AEOI standard, as well as the new Crypto–Asset Reporting Framework and to make the best use of the data received automatically. This requires the multilateral support of all partners and donors to the African Initiative to garner the necessary political support and commitment at the continental, regional and country levels and to enhance the capacities of African tax authorities to engage in and benefit from tax transparency and EOI.

Tax transparency in Africa at a glance

Tax transparency and exchange of information for tax purposes (EOI) has had a tremendous impact of domestic resources mobilisation (DRM) in Africa. A total of 41 African countries responded to the survey for the preparation of the report.* Seven African countries reported identifying over EUR 2.2 billion of additional revenues (tax, interests and penalties) through EOI in 2023, the highest amount since the launch of the Africa Initiative in 2014 and more than the total sum of additional revenues identified by African countries from 2009 to 2022. This unprecedented figure brings the total revenues identified by African countries thanks to offshore tax investigations, AEOI-related voluntary disclosure programmes (VDPs) and similar initiatives, as well as other compliance activities, supported by exchange of information on request (EOIR) and automatic exchange of financial account information (AEOI), to over EUR 3.8 billion up from EUR 1.69 billion as of December 2022.

2.2
billion EUR
of additional revenue identified through EOI by 7 African countries in 2023

39 Members of the Africa initiative

Algeria, Angola, Benin, Botswana, Burkina Faso, Cameroon, Cabo Verde, Chad, Congo (Republic of the), Côte d'Ivoire, Congo (Democratic Republic of the), Djibouti, Egypt, Eswatini, Gabon, Ghana, Guinea, Kenya, Lesotho, Liberia, Madagascar, Mali, Mauritania, Mauritius, Morocco, Namibia, Niger, Nigeria, Rwanda, Senegal, Seychelles, Sierra Leone, South Africa, Tanzania, Togo, Tunisia, Uganda, Zambia and Zimbabwe.

Donors and partners of the Africa initiative

Partners: African Development Bank Group (AfDB), African Tax Administration Forum (ATAF), African Union (AU) Commission, *Cercle de Réflexion et d'Échange des Dirigeants des Administrations Fiscales* (CREDAF), Commonwealth Association of Tax Administrators (CATA), International Finance Corporation (IFC), West African Tax Administration Forum (WATAF) and World Bank.

Donors: European Union, France, Germany, Ireland, the Netherlands, Norway, Sweden, Switzerland and the United Kingdom.

Africa in the Global Forum

- 22 African countries have joined the GlobalForum since 2014.
- 39 African countries are members of the Global Forum, they make up 23% of its membership.
- AU Commission, ATAF, AfDB and WATAF are observers.

Capacity building in figures in Africa in 2023

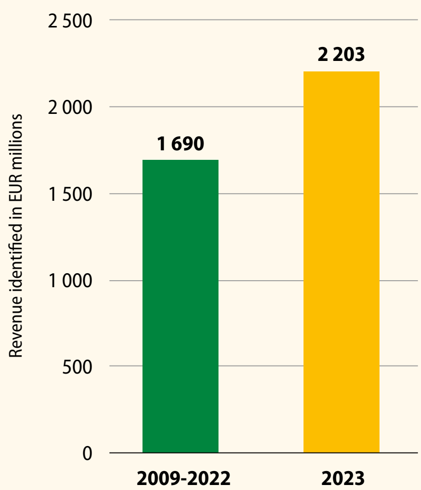
- 21 countries benefitted from a comprehensive technical assistance programme (Induction Programme), with significant progress achieved in 16 of them.
- 11 members received tailored support.
- 2 non-members received pre-membership support.
- 23 training events were held with the participation of 1 309 officials from 37 members and non-members.
- 30 officials from 16 African countries participated in the 2023 edition of the Train the Trainer Programme and held 35 local trainings to train 933 tax officials in their respective countries.
- 12 female officials from 12 African members participated in the 2023 edition of the Women Leaders in Tax Transparency programme.

* All members of the Africa Initiative (except Djibouti) and three non-members (Burundi, Comoros and Gambia) responded to the survey.

Revenue identified by African countries in 2023

Seven African countries reported identifying additional revenues totalling over EUR 2.2 billion through the use of EOI, the highest amount identified by African countries in any given year. Since 2009, 12 African countries have identified over EUR 2.5 billion through EOIR alone. One African country reported identifying close to EUR 30 million in 2023 through the use of financial account data received automatically under the Common Reporting Standard (CRS). Since 2017, two African countries out of the five that are currently participating in AEOI have reported identifying over EUR 40 million in additional revenue through the use of CRS data, signifying the huge potential for AEOI to enhance DRM in Africa. In total, since 2009, African countries have identified over EUR 3.8 billion of additional revenues as a result of the use of EOIR and AEOI to support offshore tax investigations, and AEOI-related VDPs.

Revenues identified by African countries in 2009-2022 and in 2023

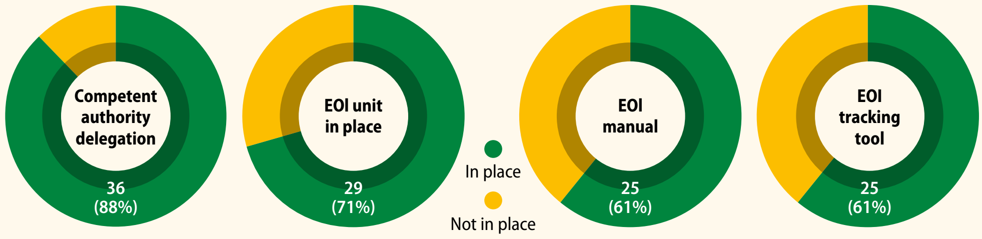


3.8
billion EUR
of additional revenue identified through EOIR & AEOI in Africa since in 2009

Implementation of exchange of information in Africa in 2023

African countries continue to set up the building blocks essential for effective EOI. Support is being provided to Africa Initiative members to establish the EOI infrastructures necessary for effective participation in EOI.

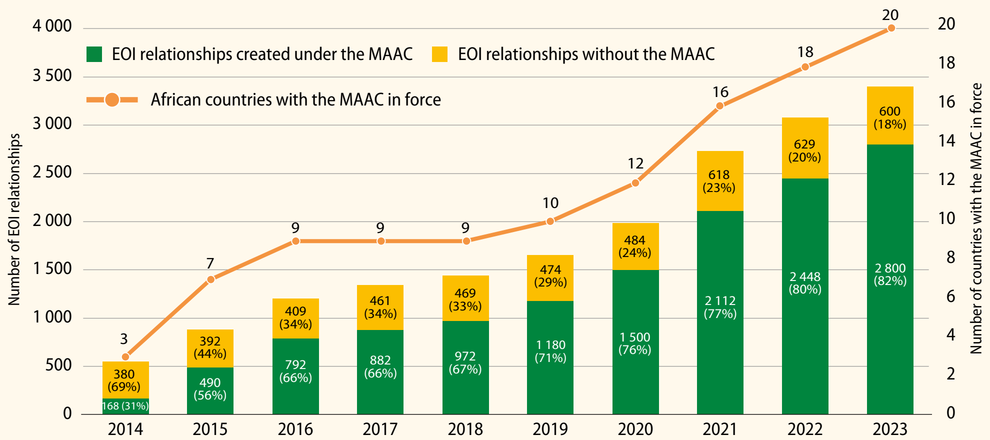
African countries' infrastructure for exchange of information (2023)



Expanding exchange of information relationships

Africa's EOI network has reached over 3 400 EOI relationships (agreements in force), of which 82% are EOI relationships created under the Convention on Mutual Administrative Assistance in Tax Matters (MAAC).

Number of exchange of information relationships in force established by African countries since 2014 (worldwide)



Requests for information sent and received by African countries in 2023

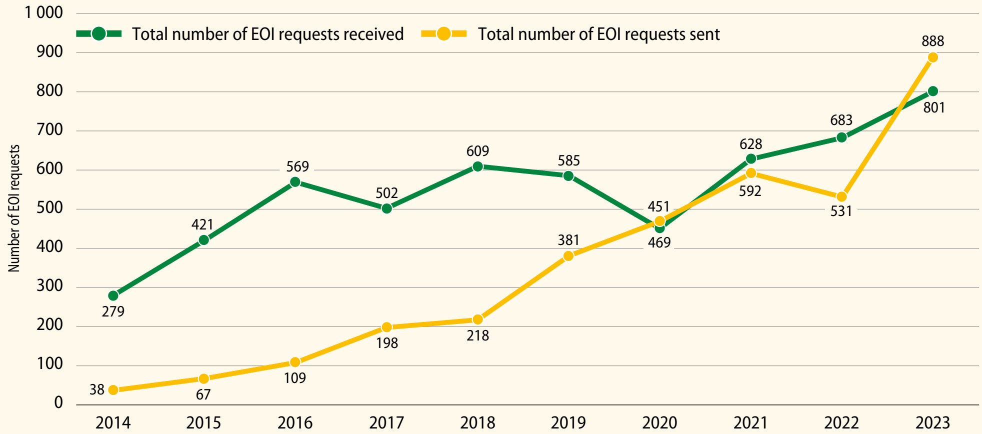
19 African countries sent EOI requests in 2023. In aggregate, African countries also became net senders of EOI requests in 2023 making a total of 888 EOI requests, the highest number since the Africa Initiative was established, and receiving a total of 801 EOI requests. However, the potential of EOIR is still underexploited on the continent as the use of EOIR (number of requests sent and additional revenue identified) is dominated by a handful of countries.

888

EOI requests

sent in 2023, the highest number since 2015

Requests for information sent and received by African countries since 2014



Implementation of automatic exchange of financial account information in Africa

2017	Seychelles South Africa
2018	**Mauritius** Seychelles South Africa
2019	**Ghana** Mauritius Seychelles South Africa
2020	Ghana Mauritius **Nigeria** Seychelles South Africa
2023 (Expected)	Ghana Mauritius Nigeria Seychelles South Africa
2024 (Expected)	Ghana **Kenya** Mauritius Nigeria Seychelles South Africa
2025 (Expected)	Ghana Kenya Mauritius **Morocco** Nigeria **Rwanda** **Senegal*** Seychelles South Africa **Tunisia** **Uganda**
2026 (Expected)	**Cameroon*** Ghana Kenya Mauritius Morocco Nigeria Rwanda Senegal Seychelles South Africa Tunisia Uganda

* In 2024, Senegal and Cameroon committed to first automatic exchanges under the AEOI standard by 2025 and 2026 respectively.

1

The critical role of tax transparency in fighting illicit financial flows in Africa

Transparency and exchange of information for tax purposes (EOI) is now widely recognised as an effective tool for fighting illicit financial flows (IFFs) and enhancing domestic resource mobilisation (DRM). In 2023, the implementation of this tool enabled African countries to significantly enhance the fight against tax evasion, thus identifying unprecedented additional revenues (tax, interests and penalties).

"In addition to the standard setting, peer reviews and monitoring, the greatest value proposition of the Global Forum and its regional initiatives is its unwavering commitment to capacity building and outreach aimed at enhancing tax transparency across the globe. The year under review is no different, and the impressive work of the Global Forum in these areas is evidenced by the continued enhancements in exchange of information processes, requests and responses and the resultant much needed additional revenues being collected. Africa Initiative members have benefitted from direct assistance by the Global Forum, as well as participation in its expert offerings of Train the Trainer and Women Leaders in Tax Transparency Programmes. It is only through such activities that tax transparency can be imbedded as part of tax ecosystems and tax administrations' arsenal of tax tools, which is essential to support the developmental needs of many developing countries. No smart, modern tax administration can be complete without effective cross–border information sharing and cooperation. Collaboration is essential if we are to serve our shared ambition for effective resource mobilisation to fight poverty, unemployment and inequality. As co–chair of the Africa Initiative it gives me great personal satisfaction to see the impact that the Global Forum is making in building, enhancing and supporting these capabilities within tax administrations."

Edward Kieswetter, Commissioner, South Africa Revenue Authority, and Co–Chair of the Africa Initiative in OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/2024–global–forum–capacity–building–report.pdf.

"The creation of the Africa Initiative was prompted by the need to make tax transparency a lever for increasing public resources in African countries. This can only be achieved through strong political support and, above all, capacity building that enables tax administrations to make effective use of international information exchange in the fight against international tax evasion and avoidance.

In 2023, the Global Forum's African member countries benefited from numerous support initiatives under the Africa Initiative. The technical assistance provided by the Global Forum Secretariat was decisive in further strengthening the quality of national legislation on transparency and exchange of information. It has also enabled the transfer of knowledge and know–how through the training of tax administrations officials, including the training of trainers, which has already provided 27 African countries with local, long–term expertise in information exchange training. The publication of the Toolkit for Establishing a Function for Cross–Border Assistance in the Recovery of Tax Claims gives our administrations the means to use this other form of international tax cooperation to ensure that tax due is collected even when the taxpayer or his assets are located abroad. These efforts strengthen African tax administrations in their mission to mobilise tax revenues.

I would like to congratulate the Secretariat team and encourage them to continue this support, given that most of our tax administrations are just beginning their path towards the use of international information exchange as an essential component of their tax revenue mobilisation strategy."

Philippe Kokou Tchodie, Commissioner General, Togolese Revenue Office, and Co–Chair of the Africa Initiative in OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report, Global Forum on Transparency and Exchange of Information for Tax Purposes,* OECD, Paris, op. cit.

CURBING ILLICIT FINANCIAL FLOWS THROUGH TAX TRANSPARENCY

While globalisation generates many opportunities for corporates and individuals to increase global wealth, it has also resulted in challenging risks, such as the use of the ease of doing business for illegitimate purposes. While cross–border flows of capital increase in the context of globalised economies with taxpayers trying to exploit the lack of transparency and the gaps in the domestic tax legislations, tax authorities remain restricted to their jurisdictions. IFFs, which have been identified as capturing the resources needed for Africa's development,[1] are facilitated by the ease to transact across the border. The drivers of IFFs include factors

1. A 2023 report by the African Development Bank Group estimates that Africa has lost over USD 1 trillion in IFFs over the last 50 years, and it is projected that Africa will continue to lose about USD 89 billion annually, if no action is taken. For more see AfDB (2023), *Africa Economic Outlook 2023: Mobilizing Private Sector Financing for Climate and Green Growth in Africa*, https://www.afdb.org/en/documents/african–economic–outlook–2023.

such as limitations in regulations, inadequate capacities in tax authorities, lack of transparency and the reign of secrecy, and the limitation and asymmetry of information among tax authorities.

Curbing IFFs is critical to attaining the 2063 African Union (AU) vision, which depends on the ability of Africa to finance its own development. International tax co–operation through the implementation of the standards of transparency and exchange of information for tax purposes (EOI) plays a key role in curbing IFFs[2] and enhancing DRM.

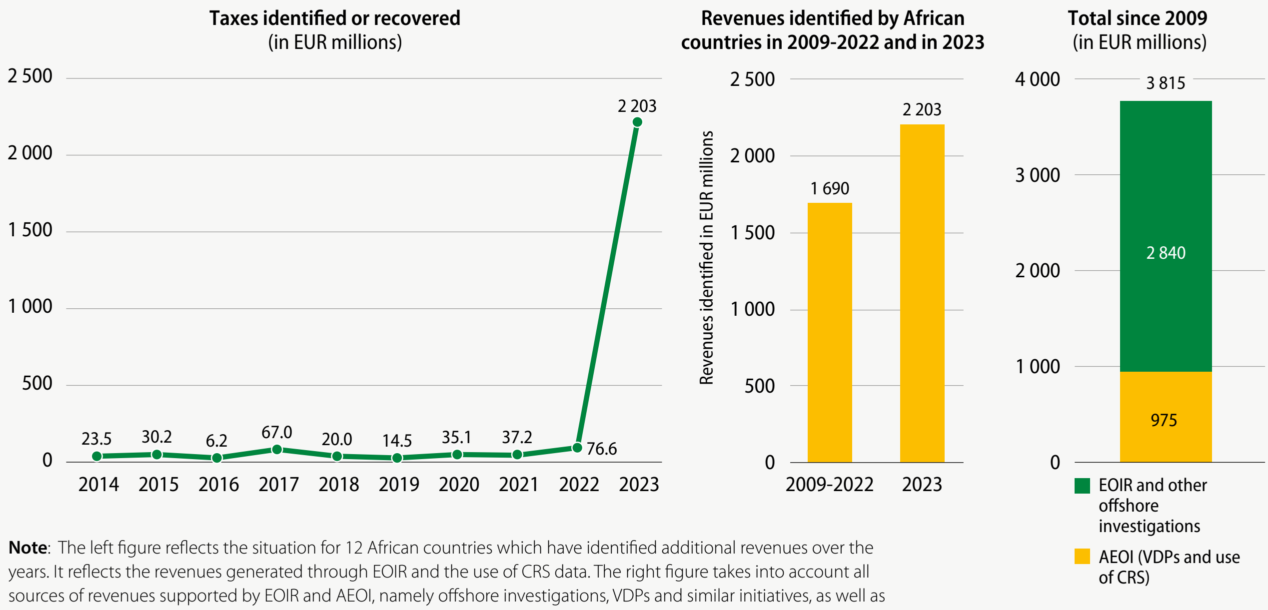
The tax transparency standards, the Standard on Transparency and Exchange of Information on Request (EOIR) and the Standard on Automatic Exchange of Financial Account Information (AEOI) under the Common Reporting Standard (CRS), promote the adoption and implementation of legal and administrative frameworks that ensure the availability of, access to and effective exchange of critical information. This includes legal and beneficial ownership, accounting and banking information. Beyond tax, the implementation of these standards enables law enforcement authorities to track, detect and sanction the abuse of legal entities and arrangements and the financial system for illicit activities.

IMPACT OF EXCHANGE OF INFORMATION ON REVENUE COLLECTION

The overall objective of EOI is to enable tax authorities to obtain information held in foreign jurisdictions that is relevant for tax investigations, audits and other compliance activities. Access to this information helps tax authorities better enforce their tax laws and, ultimately, raise additional revenues.

As of December 2022, Global Forum members had identified more than EUR 126 billion of additional revenues (tax, interests and penalty), thanks to the implementation of the EOIR and AEOI standards, including the related voluntary disclosure programmes (VDPs) and offshore tax investigations. Overall, developing

FIGURE 1. **Revenues identified as a result of exchange of information, in EUR million**



Note: The left figure reflects the situation for 12 African countries which have identified additional revenues over the years. It reflects the revenues generated through EOIR and the use of CRS data. The right figure takes into account all sources of revenues supported by EOIR and AEOI, namely offshore investigations, VDPs and similar initiatives, as well as other compliance activities related to EOI.

Source: Tax Transparency in Africa Survey 2024.

2. United Nations. Economic Commission for Africa (2015), *Illicit financial flows: Report of the High Level Panel on Illicit Financial Flows from Africa, Addis Ababa*, https://repository.uneca.org/handle/10855/22695; African Union Commission (2019), *Domestic Resource Mobilization: Fighting against Corruption and Illicit Financial Flows*, AUC Publishing, Addis Ababa, https://au.int/pt/node/37326; UNCTAD (2020), *Economic Development in Africa Report 2020, Tackling Illicit Financial Flows for Sustainable Development in Africa*, United Nations, Geneva, https://unctad.org/publication/economic–development–africa–report–2020.

members, including African countries, reported around one third of this amount (EUR 41 billion).[3]

In 2023, EOIR made a significant impact on DRM in Africa. Seven African countries reported identifying over EUR 2.2 billion in additional revenues thanks to EOIR and data received under the CRS, the highest amount ever since the Africa Initiative was established in 2014 (see Figure 1) and more than the total additional revenues cumulatively identified in the period 2009 to 2022 (a total of EUR 1.69 billion as of December 2022). The remarkable additional revenues identified by African countries in 2023 emphasises the relevance of EOI to fighting IFFs from Africa and its potential to generate substantial resources domestically and support other DRM efforts.

In total, between 2009 and 2023, African countries that are using EOI have cumulatively identified over EUR 3.8 billion of additional revenues (see Figure 1). This amount is likely to be higher, as not all African countries systematically monitor EOI's impact on DRM, and some of them have not provided data. Only 18 out of 41 African countries that responded to the survey monitor the contribution of EOI to revenue collection. Eight African countries monitor the additional revenue identified through occasional case–by–case feedback received from tax auditors and investigators. Ten African countries use the Global Forum's Impact Assessment Tool[4] or an automated tracking system inspired by the same model. Five have not put in place a monitoring system, as they have not yet sent their first EOI requests while the remaining 18 do not have a monitoring system.

The impact of exchange of information on request

The EOIR standard is an essential tool for tax authorities worldwide to ensure that all taxpayers pay the correct amount of tax. It requires jurisdictions to ensure the transparency of legal and beneficial ownership of legal entities and arrangements, accounting records and banking records (including beneficial owners of account holders). Under this standard, tax authorities can make specific requests to other tax authorities for information that will allow them to progress their tax audits, investigations and other compliance enquires.

In 2023, six African countries (Cameroon, Kenya, Lesotho, South Africa, Tunisia and Uganda) identified over EUR 2.2 billion in additional revenues they attribute to the information obtained at request from foreign partners. Since 2009, EOI has enabled 12 African countries to identify over EUR 2.5 billion (see Figure 1).

BOX 1. **SOUTH AFRICA – Relevance of beneficial ownership information to the resolution of an audit case**

The South African Revenue Service (SARS) suspected that Taxpayer X had undeclared foreign income, which was subject to taxation in South Africa. Using domestic resources, SARS identified the relevant related entities and bank accounts, but could not confirm that Taxpayer X was the beneficial owner of the income.

SARS sent a request for information to the foreign Jurisdiction Y, based on the EOI provisions of the double taxation convention in force with this foreign jurisdiction. The request was aimed at clarifying the foreign source income and confirming whether Taxpayer X was the beneficial owner of that income. More specifically, SARS requested information on the beneficial owners, legal owners and nature of business of the related entities, as well as the beneficial owners and bank statements for the relevant bank accounts identified.

SARS received information confirming that Taxpayer X was the beneficial owner of the related entities and the bank accounts. SARS also received copies of bank statements that were admissible in court. Information received was used to support additional assessments amounting to EUR 174 million (ZAR 3.5 billion).

The case is currently under appeal and will be heard in the Tax Appeal Court shortly.

Source: South African Revenue Service (SARS).

3. OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/2024–global–forum–capacity–building–report.pdf.
4. The Global Forum's impact assessment tool is available to tax authorities upon request. For more information: https://www.oecd.org/tax/transparency/documents/documents–available–to–tax–authorities–upon–request.htm.

BOX 2. **LESOTHO – Exchange of information plays a key role in combatting VAT fraud**

An informant approached the tax administration of Lesotho, Revenue Service Lesotho (RSL) with information regarding a fraud committed by his former employer (Taxpayer A), which was depriving Lesotho of tax revenues. The information submitted indicated that Taxpayer A operates a wholesale business and purchases goods from suppliers in Country X without paying value added tax (VAT) and imports them into Lesotho. Lesotho and Country X have a special agreement in place that provides for the VAT paid in the export country to be refunded in the import country. Taxpayer A then creates fake invoices showing VAT allegedly paid on these purchases imported into Lesotho. These fake invoices were then submitted to RSL to claim the VAT purportedly paid in Country X.

The Investigations Unit of RSL launched an investigation, which revealed that Taxpayer A had three main suppliers in Country X. It further established that Taxpayer A indeed used fraudulent invoices when declaring the imports into Lesotho thereby denying RSL of VAT on imports and posing a risk to the corporate income tax payable on the profits of Taxpayer A. The investigations further revealed that, in practice, the three suppliers in Country X issued invoices without levying VAT to customers who purchased goods from them with an intention to export them to neighboring countries.

During the 2020/21 financial year, the Investigation Unit approached the EOI Unit with an intention to request information from Country X with who Lesotho had an EOI agreement in force. The Investigation Unit explained that they had not exhausted all means available domestically because they were investigating a case of clear fraud and feared that the evidence would be destroyed if Taxpayer A was approached to provide some additional information or became aware of such enquiries. It was also discovered that Taxpayer A was working in collusion with rogue RSL officials at the customs entry points into Lesotho who ensured that the goods imported by Taxpayer A were not inspected to ensure correct taxes were paid.

A request for information, namely on the invoices issued by the three suppliers in Country X to Taxpayer A, was made to Country X. The request covered the months for which the fraudulent activities were observed based on the information supplied by the informant and investigations. Country X promptly obtained and provided the invoices requested within four months of receiving the request. The invoices confirmed that Taxpayer A had not been charged VAT but had altered the invoices submitted to RSL to indicate that VAT had been charged.

After further examinations, RSL issued an additional assessment of EUR 52 720 (LSL 1 million) in principal taxes – penalties and interests will be imposed by the Courts based on an application submitted by the RSL. In addition, the taxpayer is facing a criminal prosecution for tax fraud. Moreover, the RSL employees who collaborated with Taxpayer A have been sanctioned and dismissed from employment.

Source: Revenue Service Lesotho (RSL).

If a country does not send requests, it cannot obtain information that is critical to the resolution of an ongoing tax audit or investigation with a cross–border element. Consequently, potential additional tax revenue that may be assessed using offshore information may remain out of the reach of tax authorities. Active involvement in EOI, for example by attending to EOI requests from foreign partners, may also trigger domestic investigations into the tax affairs of a taxpayer leading to an assessment. Box 1 highlights the importance of EOIR as a deterrent to tax evasion and as a tool for identifying additional revenues. Box 2 shows that EOI can enable tax authorities to confirm the veracity of documents submitted by taxpayers to combat value added tax (VAT) fraud and raise additional revenues. In this case, EOI also facilitated the criminal prosecution of taxpayer and colluding tax officials, thus facilitating the greater fight against IFFs.

The impact of automatic exchange of financial account information

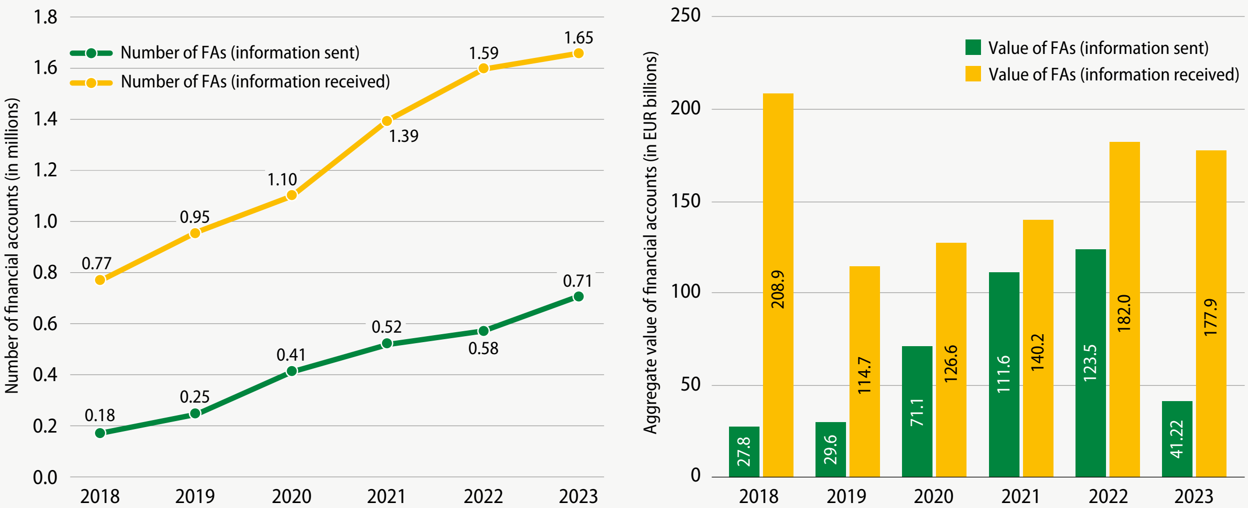
AEOI enables tax authorities to receive, on an annual basis and without a prior request, a predefined set of information on the financial accounts held by their residents offshore. The ultimate objective of AEOI is to provide tax authorities with a global view of the financials assets of their residents. This data may be used

14th meeting of the Africa Initiative, 28 November 2023, Lisbon, Portugal.

for pre–filing of tax return data, taxpayer notification, risk assessments, tax audits and the identification of taxpayers' assets that may be targeted for cross–border assistance in the recovery of tax claims (CBAR). In addition, the AEOI standard is complementary to EOIR, as AEOI data may lead to tax authorities making more requests for information. As taxpayers know that information on the financial accounts they hold in foreign jurisdictions will be exchanged automatically with the tax authorities of their jurisdiction of residence, AEOI has a powerful deterrent effect. Overall, it enables tax authorities to effectively enforce their tax laws, enhance voluntary compliance, improve taxpayer morale and support other DRM efforts by raising additional revenues.

In 2022, tax authorities around the globe exchanged information on over 123 million financial accounts with a total value of almost EUR 12 trillion. Of these, developing countries received information on over 33 million financial accounts, covering assets of nearly EUR 2.9 trillion, and sent information on over 16 million financial accounts, representing nearly EUR 0.5 trillion in assets.[5]

FIGURE 2. **Number and value of financial accounts covered by African countries' automatic exchanges of financial account information**



Note: The figure is based on the data provided by the five African countries that are exchanging information under the CRS–AEOI standard. FA refers to financial accounts. The value of financial accounts sent by African countries in 2023 only contains information relating to three countries.

Source: Tax Transparency in Africa Survey 2024

5. OECD (2023), *Pioneering Global Progress in Tax Transparency: A Journey for Transformation and Development – 2023 Global Forum Annual Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris https://www.oecd.org/tax/transparency/documents/global–forum–annual–report–2023.pdf.

In 2023, the five African countries implementing AEOI received more information in terms of number of financial accounts and the aggregate value of financial accounts held by their residents offshore than they sent to their AEOI partners. They sent information on 710 000 financial accounts with an asset value of EUR 41.22 billion and received information on 2.65 million financial accounts with an asset value of EUR 177.87 billion (see Figure 2). This trend has remained constant for African countries exchanging information automatically since 2018. It demonstrates that African countries stand to benefit more from the implementation of the AEOI standard as they receive more information than they send and have started to put in place measures to make effective use of the CRS data leading to the identification of additional revenues.

Ghana reported that the CRS data received contributed to the identification of close to EUR 30 million in additional revenue in 2023 (see Box 3). Since 2017, two of the five African countries participating in AEOI have identified a total of over EUR 40 million in additional revenue through the exploitation of incoming CRS data. Overall, the additional tax revenues linked to the implementation of AEOI since 2018 is close to EUR 1 billion, for three African countries exchanging information automatically, with the revenues arising from VDPs related to AEOI (see Figure 1).

BOX 3. **GHANA – The impact of automatic exchange of financial account information on revenue collection**

As a developing country that does not host a financial centre, Ghana was not asked to commit to start the AEOI by 2017 or 2018. However, considering the potential of AEOI, Ghana voluntarily committed to implement AEOI and undertook first exchanges in 2019 on a non–reciprocal basis and, from 2022, on a reciprocal basis.

In 2022, the Ghana Revenue Authority (GRA) received information on 181 946 financial accounts with a total value of EUR 5.7 billion and sent information to AEOI partners on 28 031 financial accounts with a total value of EUR 2.9 billion.

Why does the GRA consider CRS data as crucial for revenue collection?

The utilisation of CRS data has empowered Ghana to identify instances of tax evasion and enhance tax compliance significantly. For instance, the received CRS data provides a great opportunity for Ghana to fully explore the vast potential in taxing resident persons on their worldwide income as provided in Ghana's Income Tax law (Act 896). Taxing of resident person on income from foreign sources was largely impossible in the past due to lack of information and lack of capacity to obtain it.

Thanks to the CRS data obtained from treaty partners, Ghana is in position to uncover hidden assets and income, thereby deterring tax evasion both domestically and internationally as part of Ghana's commitment to combat tax evasion and illicit financial flows. This contributes to Ghana's tax–to–GDP ratio objective of 17.5% to aid its developmental goals.

What steps has the GRA taken to utilise the CRS data? How is this information used? Has it led to follow up requests for information to the sending jurisdiction? Has it led to the identification of additional revenue (tax, interests and penalties)?

The GRA is currently using the twin track approach strategy to ensure tax compliance, due to the large and bulky nature of the matched CRS data received.

The twin track approach combines the prospect of encouraging the largest number of non–compliant taxpayers to come forward voluntarily to correct their tax affairs, and, in instances where persons are unwilling to cooperate with the tax authority, a strict application of the law is used.

The implementation of a Special Voluntary Disclosure Program (SVDP), which is expected to be fully rolled out in the last quarter of 2024, underscores Ghana's proactive approach to leveraging CRS data for revenue mobilisation and voluntary compliance.

Additionally, Ghana has adopted the use of data analytics and risk–based audit methodologies to maximise the operational use of CRS data, leading to substantial revenue gains. The collaboration between the EOI Unit, the Domestic Tax Revenue Division and the Data Analytics Unit attests to Ghana's commitment to utilising technology to enhance tax administration and enforcement.

The 2022 CRS data received has also led to follow up requests for information to the sending jurisdictions. This has remarkably increased the number of requests Ghana made from 7 in 2022 to 14 in 2023.

In terms of revenue mobilisation, the use of CRS data has led to the identification of approximately EUR 30 million (GHC 387.9 million) in tax revenue and penalties in Ghana since it started receiving data in 2022.

Has GRA faced any challenges in its quest to use CRS data? What steps has GRA taken to overcome these challenges?

GRA encountered some challenges in the use of the information received. The first challenge was effectively matching CRS data to domestic taxpayer information due to the restriction of AEOI related processes to the Secure Perimeter.* The Data Analytics Unit was not considered as part of the Secure Perimeter in its initial set up, hence there was difficulty with the matching of CRS data in the secure perimeter to taxpayer information in the enterprise–wide environment. A short–term measure in resolving this issue was to bring personal identifiable information component of the taxpayer information to the Secure Perimeter for the purpose of matching the CRS data. A medium to long–term measure is to expand the Secure Perimeter to encompass the Data Analytics Unit so that the CRS data can be conveniently matched in that environment.

The GRA does not have access to the Passport Database to enable it to complete the matching process. There are efforts to get access to the Passport Database to enable the GRA match CRS data received with passport numbers as tax identification numbers (TINs).

Why does GRA consider it necessary to monitor the revenues identified as a result of incoming CRS data?

Reflecting on the received CRS data and the taxes raised for trend analysis purposes is helping Ghana identify schemes that have previously been used by potential taxpayers in evading taxes in past years. Ghana is now able to form a good impression of such person's income earning activities.

The received CRS data has yielded significant revenue since the commencement of "Effective Use", and it is envisaged to encourage future voluntary compliance among Ghana's population. It sends signals to taxpayers that disclosing all income sources will benefit them since sooner or later GRA automatically receive this information and may sanction taxpayers who have not declared taxable income held in offshore jurisdictions.

"Effective Use" of the received CRS data has a two–pronged benefit of reducing illicit financial flows, as well as raising the much–needed revenue for national development. GRA therefore has a dedicated team exclusively trained for the application of the received CRS data to objectively assess foreign financial asset holders to tax and to ensure that any taxes assessed are recovered for Ghana's development. Deepening tax compliance activities based on the received data also has the potential to influence general compliance as taxpayers would adjudge the tax system to be a fair one.

In view of the above, GRA believes that monitoring the revenues identified using the CRS data enables it to demonstrate the usefulness of AEOI. It also shows the impact of EOI in tackling tax evasion and its importance for our DRM strategy, thus justifying the investment consented by the Government for the implementation of AEOI and EOI more generally.

What lessons can other African and developing countries learn from Ghana's experience with the implementation and use of the AEOI standard to enhance the fight against tax evasion?

Ghana has encountered several challenges, including resource constraints, data privacy concerns, technical expertise shortages, delayed enactment of legislation and resistance from politically exposed persons.

To address these challenges, Ghana partnered with international stakeholders for financing the implementation of a secure perimeter approach. In addition, it adopted capacity building initiatives, engaged the law drafters and educated stakeholders on the impact of the CRS data exchanges.

Continued on page 26 ...

* A secure perimeter refers to a highly secure physical and/or virtual environment within a tax authority (and therefore adequately protected in line with relevant standards), that would enable jurisdictions to receive, keep safe, and handle information exchanged automatically, spontaneously or on request whilst longer term efforts are made to implement international Information Security Management standards across the whole tax authority. It is a tactical approach that may be implemented at a lesser cost, and within a shorter timeframe, than if the necessary security controls are implemented across the entire operations. For more information, see OECD (2020), *Confidentiality and Information Security Management Toolkit*, Global Forum on Transparency and exchange of Information for Tax Purposes, OECD, Paris https://www.oecd.org/tax/transparency/documents/confidentiality–ism–toolkit_en.pdf.

... Box 3 continued.

Other African countries can achieve success in implementing AEOI by adopting a multi–faceted approach, including partnerships with international stakeholders, staged implementation strategies, and capacity–building initiatives to counter resource constraints, data privacy concerns, and technical expertise shortages. They can also learn and adopt best practices, as well as work together with international partners and peers to overcome the inevitable challenges.

There is the need to have robust data protection and security safeguards for financial account information exchanges in line with the international standard. For developing countries this pre–requisite of the AEOI standard can be met through the implementation of an information security management (ISM) framework focused on a secure perimeter. This will address the gaps that would potentially exist in an enterprise–wide environment ISM framework, thereby giving assurance to exchange partners. This approach is also cost–effective and helps bridge the implementation timeline for developing countries.

Early engagement with law drafters, data experts, data users and relevant stakeholders will reduce undue delays in the enactment of laws. Sensitisation of top management and government officials on the effective use of received CRS data would elicit their buy–in for the adoption of the standards irrespective of the possible inherent threats it might pose to politically exposed persons.

Investing in cutting–edge technology and software will work to optimise the potential of AEOI for revenue mobilisation and tax compliance in the long run. One of the most valuable investments would be in the Multi–Data Exchange Solution (MDES) portal – the platform which facilitates the data exchanges.

Source: Ghana Revenue Authority (GRA).

13th meeting of the Africa Initiative, 6–7 July 2023, Cape Town, South Africa.

2

Developments in tax transparency in Africa in 2023

The Africa Initiative is built around two strategic axes: (i) raising political awareness and commitment in Africa, and (ii) developing African countries' capacities in tax transparency and EOI. In 2023, progress was achieved in both axes to advance tax transparency and EOI in Africa.

BUILDING STRONG POLITICAL BUY–IN TO UNPACK THE BENEFITS OF TAX TRANSPARENCY FOR ALL AFRICAN COUNTRIES

In 2023, the Africa Initiative took deliberate steps to increase political awareness on the potential of transparency and EOI by:

- participating in high–level meetings and events
- promoting the Yaoundé Declaration
- demonstrating the impact of tax transparency and EOI on DRM through the Tax Transparency in Africa Report and Africa Initiative meetings.

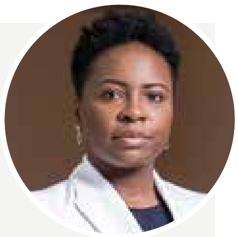
High–level political engagement in Africa at the continental and regional levels to advocate for tax transparency and exchange of information

The Africa Initiative has embraced a three–pronged approach to advancing tax transparency and EOI in Africa comprising of engagements at the continental, regional and country levels. This approach considers the different actors and their roles in shaping the policy decisions aimed at combating IFFs at all three levels. It addresses the need to raise awareness and advocate for inclusion of the tax transparency and EOI agenda at all levels of policy formulation and decision making to ensure a coordinated response to the scourge of IFFs from Africa.

In 2023, under the leadership of the Co–Chairs of the Africa Initiative, and supported by the Global Forum Secretariat, high–level political engagements were held with key actors at the continental, regional and country levels aimed at strengthening existing co–operation and partnerships on tax transparency and EOI in Africa.

At the **continental level**, several meetings were held with the African Union Commission (in February, March and

Angola



"Our membership to the Global Forum is testimony to our ongoing commitment to tax transparency and international co–operation. We are motivated to contribute and learn from the best global practices. As a new member, we hope to strengthen our institutional and political capacity. We believe that our participation will accelerate our progress towards a more inclusive and sustainable economy. Beholding ahead, we look forward to working with all Global Forum members to tackle cross–border tax evasion. In sync, we can build a fairer and more efficient tax system."

Hon. Vera Daves De Sousa, Minister of Finance, Angola

Zimbabwe

"Being part of the Global Forum on Transparency and Exchange of Information for Tax Purposes puts Zimbabwe on course to its vision 2030 of transforming the country into an upper middle–class economy by ensuring an increase in tax revenue through combating tax evasion and fighting corruption whilst making significant improvement in tax transparency with various tax jurisdictions and maintaining a fair level field in domestic tax frameworks."

Regina Chinamasa, Commissioner General, Zimbabwe Revenue Authority in OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

Democratic Republic of the Congo

"Joining the Global Forum marks for our country, the Democratic Republic of the Congo, a step further in the government's resolve to make the fight against illicit financial flows an absolute priority. Our jurisdiction wishes to take advantage of the progress made in international tax transparency and cooperation thanks to the work of the Global Forum, to curb tax evasion and thus improve the mobilisation of domestic resources so necessary for its development."

Barnabé Muakadi Muamba, Director General of Taxes, Democratic Republic of the Congo

Meeting with Alphayo J. Kidata, Commissioner General, Tanzanian Revenue Authority, February 2023.

June 2023) to strengthen the existing cooperation and partnership. Dialogue with the African Development Bank (AfDB) on potential collaboration to advance the tax transparency agenda in countries where it has projects took place in March, July and December 2023. Engagements were held with the African Tax Administration Forum (ATAF) to strengthen collaboration on capacity–building to African countries (April, July and October 2023). Finally, engagement was held with the United Nation Economic Commission for Africa on the use of tax transparency and EOI to combat tax evasion on the sidelines of the 13th Africa Initiative meeting in July 2023.

At the **regional level**, engagements to promote tax transparency were made with the West African Tax Administrations Forum (WATAF) at the high–level policy dialogue held in September 2023. Further engagements with the *Cercle de Réflexion et d'Échange des Dirigeants des Administrations Fiscales* (CREDAF) in July 2023 focused on cross–border assistance on the recovery of tax claims (CBAR). Following this, the Global Forum Secretariat, the CREDAF and the International Association of Treasury Services (AIST) partnered to deliver a joint workshop in July 2023.

At the **country level**, the Global Forum Secretariat made high–level visits during which discussions were held with ministers of finance and the heads of the tax authorities, amongst other relevant stakeholders, in Mozambique (July 2023) and Congo (November 2023). Similar engagements took place with high–level tax authorities on the sidelines of the Global Forum Plenary meeting in November 2023 with Cabo Verde, the Democratic Republic of Congo, Senegal, Togo and Zambia.

The engagements at the continental, regional and country levels contributed to tangible results to advancing the tax transparency and EOI agenda in Africa. Angola (8 March 2023), Zimbabwe (11 April 2023), Sierra Leone (15 May 2023) and the Democratic Republic of the Congo (1 December 2023) joined the Global Forum and the Africa Initiative, bringing the membership of Africa countries to 38 as of December 2023.

In addition, the mandate of the Africa Initiative was renewed for the period 2024–2026 during the 14th Africa Initiative meeting held on the sidelines of the Global Forum Plenary meeting in Lisbon, Portugal on 28 November 2023.[1] At this meeting, delegates also renewed the commitment of the Africa Initiative to continue its work to advance CBAR on the continent. The political commitment embodied in these renewals will provide a platform for assisting all African countries to fully unlock the potential of transparency and EOI.

Promotion of the Yaoundé Declaration

The *Yaoundé Declaration*[2] is a call for action by African countries to combat IFFs through tax transparency and EOI. Originally signed by four countries in November 2017, the *Yaoundé Declaration* currently counts 34 signatories, including the AU Commission. In 2023, the Co–Chairs of the Africa Initiative launched a sign–up campaign by engaging – through letters – the finance ministers of countries that have not yet signed up to the

1. The 14th Africa Initiative meeting was attended by delegates from 23 African countries, including 3 non–members and 7 partners and donors. The Statement of Outcomes of the meeting is available at https://www.oecd.org/tax/transparency/documents/14th–meeting–of–the–africa–initiative–statement–of–outcomes.pdf.
2. More details on the Yaoundé Declaration can be found at this link: https://www.oecd.org/tax/transparency/what–we–do/technical–assistance/the–yaounde–declaration.htm.

declaration to join their counterparts in promoting the use of transparency and EOI to combat IFFs and support their tax authorities to use these tools.

2023 Africa Initiative Progress Report

The TTiA report, a joint annual publication by the AU Commission, ATAF and the Global Forum Secretariat, is now well established as a barometer of the progress made by African countries in using tax transparency and EOI to combat IFFs and enhance DRM on the continent.

Thirty–eight countries (32 members and 6 non–members)[3] responded to the survey launched in January 2023. The responses facilitated the preparation of the 2023 TTiA report, the fifth edition of the report, which was launched at the 13th Africa Initiative meeting in July 2023 in Cape Town, South Africa. A key highlight of the 2023 TTiA report was the increasing contribution of tax transparency and EOI to DRM – African countries reported identifying additional revenues totalling EUR 76.6 million in 2022 – the highest amount reported in a year since the establishment of the Africa Initiative in 2014 (including the first–time identification of EUR 10.6 million in additional revenue from the use of CRS data received by one African country).

Peer–to–peer knowledge sharing

The Africa Initiative facilitates peer–to–peer knowledge and experience sharing through discussion of topics aimed at advancing the tax transparency agenda in Africa. Africa Initiative meetings enable African countries to learn from their peers who have successfully deployed EOI through sharing best practices.

The 13th Africa Initiative meeting, hosted by the South African Revenue Services (SARS) from 6 to 7 July 2023 in Cape Town, South Africa attracted over 120 in–person delegates from 26 African countries, 9 partners and donors of the Africa Initiative, and invited organisations. In addition to the onsite attendance, part of the first day of the meeting was a public session held in hybrid format, which was attended by 128 virtual participants.[4] At this meeting, delegates shared experiences on diverse topics aimed at strengthening the culture of tax transparency and EOI in Africa.[5] These included discussions on the progress made by African countries in implementing the tax transparency standards (including beneficial ownership transparency frameworks) and how to overcome any barriers to their effective implementation. Delegates also discussed ways of making effective use of the established EOI infrastructures and translating progress made on EOI into revenue gains, as well as the progress made on strengthening CBAR frameworks on the continent. Finally, delegates had the opportunity to learn from the progress of other regions on the tax transparency agenda through updates from the Asia Initiative and the Latin America Initiative.

During the 14th Africa Initiative meeting, delegates reflected and shared experiences on approaches to promote the effective use of EOIR within African tax authorities to tackle tax evasion and mobilise revenues. They also discussed the need to establish appropriate legal and administrative frameworks for participation in CBAR.[6]

Engaging with civil society organisations

As influential voices on matters which affect the society at large, civil society organisations can play an important role in advancing the tax transparency and EOI agenda on the continent. In recognition of this, the Africa Initiative incorporates their perspectives during its meetings. In 2023, civil society organisations participated in the 13th Africa Initiative meeting in Cape Town, South Africa.

3. Algeria, Angola, Benin, Botswana, Burkina Faso, Cabo Verde, Cameroon, Côte d'Ivoire, Djibouti, Egypt, Eswatini, Gabon, Gambia, Ghana, Guinea Bissau, Kenya, Lesotho, Liberia, Madagascar, Mali, Mauritania, Mauritius, Morocco, Namibia, Niger, Nigeria, Rwanda, Senegal, Seychelles, Sierra Leone, South Africa, Sudan, Tanzania, Togo, Tunisia, Uganda, Zambia and Zimbabwe.

4. Statement of Outcomes of the 13th Africa Initiative meeting is available at https://www.oecd.org/tax/transparency/documents/13th–meeting–of–the–africa–initiative–statement–of–outcomes.pdf.

5 The following jurisdictions and partners intervened during the meeting to share their experience or their perspective on the various topics discussed: Angola, Benin, Côte d'Ivoire, Ghana, Indonesia, Kenya, Mauritius, Nigeria, Paraguay, Senegal, South Africa, Togo, Tunisia, Uganda, Zimbabwe, AfDB, ATAF, AU Commission, CREDAF, IFC, UNECA and WATAF.

6. Statement of Outcomes of the 14th Africa Initiative meeting is available at https://www.oecd.org/tax/transparency/documents/14th–meeting–of–the–africa–initiative–statement–of–outcomes.pdf.

13th meeting of the Africa Initiative, 6–7 July 2023, Cape Town, South Africa.

The Global Forum Secretariat also participated in the conference organised by the International Centre for Tax and Development (ICTD) in Nairobi in June 2023 under the theme "Global Tax Governance at a Crossroads" and shared the lessons learnt from lower–income countries' experiences to date with the implementation of the EOIR and AEOI standards.

Additionally, under the Fiscal Transition Support Programme in West Africa (PATF), supported by the European Union and technical expertise from the Global Forum Secretariat, a seminar was organised in Accra, Ghana on 18 July 2023, which brought together representatives from tax authorities, anti–money laundering units, and civil society organisations (Tax Justice Coalition, the Ghana Integrity Initiative and the Ghana Anti–Corruption Coalition) to discuss progress made under the Support Programme for Fiscal Transition in West Africa (PATF) in terms of tax transparency and the fight against IFFs.

AFRICAN COUNTRIES' ACTIVE CONTRIBUTIONS TO GLOBAL FORUM'S WORK AND CAPACITY–BUILDING ACTIVITIES

All members of the Global Forum work on an equal footing to put an end to offshore tax evasion. In 2023, African countries continued to take an active part and leading role in the Global Forum's work by contributing to its technical and governance activities. They provided technical inputs and precious insights on discussions guiding the Global Forum decision–making processes (see Table 1). In addition, African countries contributed to the peer review process by providing assessors and inputs, and to the capacity–building activities by sharing experience and expertise in workshops and seminars organised by the Global Forum Secretariat (see Table 2). African countries are also taking leadership of new areas of work in the Global Forum bodies, such as the newly established Crypto–Asset Reporting Framework (CARF) Group (see Box 4).

TABLE 1. **Participation of African countries in Global Forum's bodies**

Contribution	Role	Participation
Steering Group	The Steering Group is made up of 20 members. It prepares and guides the future work of the Global Forum.	**2 African countries are members of the Steering Group and one of them also holds the position of Vice–Chair:** Kenya (Vice–Chair) and Togo.
Peer Review Group for Exchange of Information on Request (PRG)	The Peer Review Group (PRG) is made up of 30 members and oversees the Global Forum's peer reviews in relation to the EOIR standard.	**3 African countries are members of the PRG:** Eswatini, Kenya and Uganda.
Automatic Exchange of Information Peer Review Group (APRG)	The APRG is made up of 30 members and oversees the work on peer reviews against the AEOI standard.	**1 African country is member of the APRG:** Mauritius.
Automatic Exchange of Information Peer Review Group and its extended composition (APRG+)	The APRG+ is an extended formation of the APRG which oversees the peer reviews on confidentiality and data safeguards.	**2 African countries are members of the APRG+:** Mauritius and Uganda.
Crypto–Asset Reporting Framework Group (CARF Group)	The CARF Group is responsible for the implementation of the CARF. In November 2023, it was made up of 45 members and the EU. It is a voluntary group which can be joined at any time by any member.	**3 Africa countries are members of the CARF Group:** Mauritius, South Africa and Uganda. South Africa is a Co–Chair of the CARF Group.

Note: More information on the Global Forum structure is available at https://www.oecd.org/tax/transparency/who–we–are/structure/.

Source: OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

TABLE 2. **Participation of African countries in Global Forum's capacity–building activities in 2023**

Contribution	Role	Participation
Assessors on EOIR	The EOIR assessors are responsible for conducting the peer reviews of jurisdictions against the EOIR standard. All members are invited to provide assessors.	**13 African countries provided EOIR assessors:** *Cameroon, Eswatini, Ghana, Kenya, Liberia, Mali, Mauritius, Morocco, Nigeria, Senegal, Tanzania, Tunisia and Uganda.*
Assessors on AEOI	The AEOI assessors are responsible for conducting the peer review of jurisdictions against the AEOI standard.	**2 African countries provided AEOI assessors:** *Ghana and Mauritius*
Assessors on confidentiality	The assessors on confidentiality are responsible for conducting the assessments on confidentiality and data safeguards.	**4 African countries provided assessors for the confidentiality peer reviews:** *Kenya, Lesotho, Mauritius and South Africa*.
Experts for capacity–building activities	Experts from Global Forum members participate to capacity–building activities carried out, providing expertise and sharing experience.	**19 African countries shared their expertise and experience in capacity–building activities:** *Algeria, Angola, Benin, Burkina Faso, Cabo Verde, Cote d'Ivoire, Ghana, Kenya, Liberia, Mauritius, Niger, Nigeria, Rwanda, Senegal, South Africa, Togo, Tunisia, Uganda and Zimbabwe.*

Source: OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

BOX 4. **South Africa's contribution to the Global Forum's work – CARF Group**

The Global Forum has been mandated by the G–20 to monitor the implementation of the Crypto–Asset Reporting Framework (CARF) published by the OECD in June 2023. In September 2023, the G20 Leaders' declaration called upon the Global Forum "… to identify an appropriate and coordinated timeline to commence exchanges by relevant jurisdictions, noting the aspiration of a significant number of these jurisdictions to start CARF exchanges by 2027."* Following this call, the Global Forum formed the CARF Group in September 2023 to oversee its work on ensuring the widespread implementation of the CARF, starting with the commitment and monitoring processes. The CARF Group is co–chaired by **Mr Carl Scholtz** (South Africa), and **Ms Lauren Griffin** (the United Kingdom).

Why does the South Africa consider it important to participate in the leadership of the Global Forum bodies? What is the importance of the representation of developing countries in these bodies?

South Africa is fully committed to ensuring a fully transparent tax landscape and we have continuously demonstrated this since the reform of the Global Forum in 2009. In this context, we believe that participating in the leadership structures of the Global Forum is imperative to ensure that the taxing rights and interest as well as the developmental needs and requirements of developing countries are appropriately represented and addressed. It is only through active participation that historic inequalities can be addressed and revenue due can pursued and collected.

From a strategic perspective South Africa focuses on enhancing voluntary tax compliance which is illustrated in our strategic intent. In the pursuit of voluntary compliance, it is imperative we work to improve the tax ecosystem with and through international stakeholders such as the Global Forum which is instrumental in lifting the veil of tax secrecy through the robust monitoring of the international standards on Exchange of Information on Request (EOIR) and Automatic Exchange of Information (AEOI).

SARS has been championing the benefits of exchange of information from a continental perspective, through the Africa Initiative as well as the African Tax Administration Forum (ATAF). Leadership in both the Africa Initiative and ATAF enhances alignment and confluence of purpose and action in promoting tax transparency in support of domestic resource mobilisation.

* See paragraph 62 of the G20 New Delhi Leaders Declaration available at https://www.consilium.europa.eu/media/66739/g20-new-delhi-leaders-declaration.pdf.

Why does South Africa consider information to be received under the CARF important? What impact does South Africa foresee for the CARF in Africa?

Regulation of crypto–assets and crypto–exchanges, including through information to be obtained from other jurisdictions through the CARF, is crucial for South Africa due to various reasons. Firstly, the alignment of tax terminology with regulatory frameworks is essential. The shift from 'cryptocurrency' to 'crypto assets' in tax references aims to harmonize terminology with proposed regulatory frameworks, indicating the importance of consistency and clarity in legal definitions. Secondly, effective regulation is vital for investor protection and market integrity. Collaboration between government agencies and developers is highlighted as necessary to establish an ecosystem that safeguards investors and integrates protections within the crypto economy. Proper regulation can mitigate risks, enhance transparency, and foster trust in the market. Furthermore, regulated markets provide legal certainty and can drive adoption. Moreover, combating money laundering is a critical aspect of regulation. Enhancing anti–money laundering frameworks by amending legislation to include crypto–currencies is essential for protecting against illicit financial activities. Proper regulation can help prevent fraudulent activities and corruption associated with poorly regulated crypto–asset markets.

Thus, the regulation of crypto–assets and crypto–exchanges – for purposes of which EOI data on foreign crypto–assets service providers in other jurisdictions to users in South Arica is crucial – in South Africa is vital for tax clarity, investor protection, market integrity, legal certainty, and combating financial crimes. By aligning tax terminology, enhancing investor safeguards, providing legal clarity, and addressing money laundering risks, effective regulation can promote a healthy and secure environment for crypto–related activities in the country.

The CARF is anticipated to have a significant impact in Africa. The framework, designed to address the use of crypto assets to avoid taxation, has garnered pledges from some 56 countries for adoption. This adoption signifies a global commitment to combat tax evasion facilitated by crypto assets, which could have implications for African countries seeking to strengthen their tax systems and revenue collection.

The interdependency between Council Directive amending Directive 2011/16/EU on Administrative Cooperation in the Field of Taxation (DAC8), the Markets in Crypto–Assets Regulation (MiCA), and the CARF highlights the interconnected nature of regulatory frameworks in the crypto space. This interconnectedness suggests that the implementation of the CARF in Africa may need to align with other regulatory initiatives to ensure consistency and effectiveness in addressing crypto–related challenges.

The OECD's initiative to implement a system for reporting crypto–asset transactions to tax authorities worldwide through CARF, modelled after the Common Reporting Standard, indicates a concerted effort to enhance transparency and compliance in the crypto sector. For African countries, this could mean improved mechanisms for tracking and regulating crypto transactions, potentially leading to better tax compliance and revenue generation.

The impact of the CARF on Africa's crypto landscape is also intertwined with the broader regulatory environment and market dynamics. The framework's potential to positively influence the adoption of crypto–assets in the financial sector underscores the importance of regulatory clarity and legal certainty in fostering market growth. In Africa, where regulatory frameworks for crypto–assets are still evolving, the CARF could provide valuable guidance for policymakers in shaping effective regulations.

In conclusion, the CARF is poised to bring about significant changes in Africa's approach to regulating crypto–assets. By promoting transparency, combating tax evasion, and enhancing regulatory harmonization, the framework has the potential to strengthen Africa's crypto ecosystem and contribute to the region's economic development.

Continued on page 34 ...

... Box 4 continued.

When does South Africa anticipate its first CARF exchanges and what steps has it taken for an effective implementation?

1. South Africa signed the CARF Joint Statement in 2023 and is committed to its implementation.
2. The drafting of domestic legislation in the form of Regulations under the Tax Administration Act, 2011, to incorporate the CARF is projected to commence in 2024 and conclude between late 2024 and early 2025.
3. The legislative process will involve stakeholder interactions and inviting public comment on the draft Regulations, which will be published by the Minister of Finance but does not need to enter the Parliamentary process.
4. Signing the CARF Multilateral Competent Authority Agreement at administrative level requires prior approval by the Minister of Finance but does not require ratification by Parliament and should thus be a relatively straightforward process.
5. South Africa anticipates to be ready for first CARF exchanges in line with the mutually agreed timeline of 2027.

Source: South African Revenue Service (SARS).

ENHANCING THE CAPACITIES OF AFRICAN TAX AUTHORITIES ON TAX TRANSPARENCY IN 2023

The second strategic axis of the Africa Initiative is focused on developing capacity in transparency and EOI to ensure that African countries are able to use the tax transparency standards to combat tax evasion and enhance DRM. In 2023, this took the form of technical assistance, developing tax officials' skills in EOI and other capacity–building support.

Technical assistance

With the support of partners and donors of the Africa Initiative, the Secretariat delivered intensive technical assistance to African countries in 2023 through induction programmes, tailored assistance programmes and pre–membership support, covering multiple areas of EOIR and AEOI standards. On EOIR, 21 African countries benefitted from an induction programme (a multi–year comprehensive capacity–building programme offered to new members of the Global Forum) out of which 16 were advanced in 2023, while 11 African countries benefitted from tailored support to address specific issues in the implementation of the EOIR standard. On AEOI, 11 African countries received assistance on various aspects of its implementation. Table 3 summarises the technical assistance provided to African countries in 2023.

The capacity–building initiatives also involved reaching out to non–members to raise awareness on the potential of transparency and EOI. In 2023, the Secretariat provided pre–membership programmes for 6 non–members (Burundi, the Democratic Republic of the Congo, Guinea Bissau, Mozambique, Sierra Leone and Zambia) which included:

- information sessions on the benefits generated and commitments made when joining the Global Forum
- awareness raising for national stakeholders on the benefit of tax transparency for the fight against tax evasion and other IFFs
- invitation to attend the Africa Initiative and Plenary meetings as observers, to understand the progress made and realise the potential that transparency and EOI can generate for their countries
- bilateral meetings to discuss their participation in the tax transparency work and offer more tailored support if needed.

In 2023, four countries (Angola, Democratic Republic of the Congo, Sierra Leone and Zimbabwe), which benefitted from pre–membership assistance in past years, joined the Global Forum after having been exposed to a number of awareness–raising activities, which highlighted the benefits of implementing the tax transparency standards.

TABLE 3. **Technical assistance provided to African countries in 2023**

Area	Topic and description	No. of countries supported
EOIR	**Improving the legal and regulatory framework for EOIR**: assistance to improve the EOIR legal and regulatory framework, which included in–depth analysis of the maturity of the legal and regulatory framework, review of proposed legislation to ensure it meets the requirements of the EOIR standard, and proposal of amendments to address identified gaps.	17
	Practical implementation of the legal and regulatory framework for EOIR: assistance aimed at improving the practical implementation of the legal and regulatory frameworks for EOIR.	12
	Improving beneficial ownership transparency: assistance to improve beneficial ownership transparency frameworks.	12
	Improving the organisation of tax administrations and setting up EOI units with appropriate tools: assistance on establishing or improving EOI units (including assistance to develop EOI tools e.g. manual).	9
	Broadening EOI networks through joining the Convention on Mutual Administrative Assistance in Tax Matters (the MAAC): support at different steps of the MAAC process, including the submission of the request to be invited to sign the MAAC, the signing of the MAAC, and the deposit of instrument of ratification.	11
AEOI	**Establishing an appropriate legal framework**: assistance to incorporate the requirements of the CRS into domestic law.	11
	Establishing an appropriate information security management framework: assistance to establish or improve the ISM framework for AEOI.	2
	Establishing an administrative compliance strategy: assistance to establish and implement an administrative compliance strategy for effective implementation of the AEOI standard.	2
	Making effective use of CRS data: assistance provided to put in place appropriate framework for matching data received to domestic database to make it more useful for tax compliance activities.	1

Source: Global Forum Secretariat.

Training to develop tax administration officials' skills in exchange of information

Capacity–building provided by the Secretariat is aimed at ensuring that all members of the Global Forum, especially developing countries, receive support, and benefit from the available tools to implement the tax transparency standards and benefit from them. In 2023, the Africa Initiative continued to deliver trainings to enhance the capacity of its members to make use of the established infrastructure in the fight against tax evasion. Several training workshops and seminars were delivered to African countries to enable them to make effective use of their EOI networks and established infrastructures to tackle IFFs and enhance DRM. In 2023, 23 training events were held for or with the participation of 1 309 officials from African countries as indicated in Table 4.

Global Forum Secretariat and World Bank assist Cabo Verde in preparation of its peer review on transparency and exchange of information on request, 14–16 March 2023, Praia, Cabo Verde.

TABLE 4. **2023 Capacity–building events on exchange of information for African countries**

Topic	Description	No. of officials
AEOI	5 workshops and seminars covering several topics including: • Key elements of the AEOI standard • Consultations and sensitisations for financial institutions • Administrative compliance framework for tax authorities	230
EOIR and Beneficial Ownership	9 trainings on EOIR and beneficial ownership	238
ISM	4 seminars on ISM covering the following topics: • AEOI secure perimeter • information classification and handling • effective monitoring of logs for critical suspicious activities • effective protection from exfiltration of exchanged data	147
CBAR	2 regional workshops on CBAR with ATAF and with CREDAF, AIST and France on the legal and administrative structure required for effective participation in CBAR	99

Source: Global Forum Secretariat.

Train the Trainer programme

Launched as a pilot for Africa in 2021, the Train the Trainer programme is designed to build the EOI knowledge of tax authorities' officials, which could be sustainably transferred to other officials in their country. This approach of capacity building seeks to increase local ownership of EOI technical skills, create sustainable EOI capacity within the tax authorities and alleviate resource constraints which may restrict the number of trainings delivered by the Secretariat and other partners to countries.

Based on the success of the pilot, the programme was offered to African countries again in 2022 and 2023 In 2023, 30 officials from 15 African countries participated

in the 2023 edition of the programme and delivered 35 local trainings with the participation of 933 officials. Table 5 shows the overall impact of the 2021, 2022 and 2023 programmes for Africa, and Box 6 highlights the experience of participants to the 2023 edition of the programme.

In December 2023, for the first time, the participants of the various editions of the Train the Trainer Programme gathered together in Paris, France to take stock of the impact of their work in spreading EOI knowledge within their respective tax administration, discuss challenges faced and potential solutions to address them, as well as the next steps in advancing EOI knowledge (see Box 7).

TABLE 5. **Overall results of the Train the Trainer programme in Africa, as at 31 December 2023**

	2021 cohort	2022 cohort	2023 cohort	Total
Train the trainer programme				
Number of countries	17	13	16	28
Number of participants (trainers)	34	27	30	91
Female participation (%)	47%	44%	50%	48%
Local training sessions				
Number of trainings proposed to be delivered	34	28	34	96
Number of trainings delivered	43	21	35	99
Number of officials trained(1)	1 375	433	933	2 741
Female participation (%)	30%	41%	38%	33%

Note: the figures on the 2021 cohort include the local trainings organised in 2021, 2022 and 2023. The figures on the 2022 cohort include the local trainings organised in 2022 and 2023. (1) The figures are as of 31 December 2023.

Source: OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

16th Global Forum plenary meeting, 29 November–1 December 2023, Lisbon, Portugal.

BOX 5. BURKINA FASO – Three years' experience of the Train the Trainer programme and local initiatives

Burkina Faso joined the Global Forum in 2012 and implements the EOIR standard. The country signed the MAAC in 2016 and it recently entered into force on 1 April 2023. Burkina Faso's Directorate General of Taxes (Direction Générale des Impôts – DGI) joined the Train the Trainer programme when the pilot phase was launched in 2021 and participated in the programme in 2023.

What motivated the DGI to enrol agents in the Train the Trainer programme?

With the globalisation of the economy due to the mobility of capital and assets, Burkina Faso's DGI became aware of the need to strengthen its means of auditing the cross–border transactions of taxpayers, including multinational enterprises, with particular emphasis on EOI. After setting up an operational EOI function within the DGI, capacity building for tax audit staff was identified as the other challenge to be met in order to make the use of EOI a reality. The first training sessions organised with the support of the Global Forum Secretariat enabled the first EOI requests to be sent out. However, there was a need to speed up training and reach a wider spectrum of agents. In this context, the Train the Trainer programme was a godsend for the DGI in that it offered it the opportunity to acquire in–house, long–term expertise in EOI training. Our country has participated in both editions of the programme.

In many African countries, the exchange of information is still underused in the fight against international tax evasion and avoidance. To what extent has the Train the Trainer programme helped promote the use of this essential tool in cross–border tax audit?

By providing the Burkina Faso tax authorities with local expertise in training in the use of EOI in international tax audits, the Train the Trainer programme has already made it possible to train 347 tax officials in Burkina Faso, mainly auditors and investigators, between 2021 and 2023. The training is provided by four local trainers from the programme. The multiplier effect of this programme is having an impact on the use of EOI in Burkina Faso, as an increasing number of inspectors, auditors and investigators now know how to use EOI as a powerful tool for monitoring the tax compliance of multinational enterprises and other taxpayers involved in cross–border transactions. As proof of this, at the end of the training, the officials undertook to initiate EOI requests during future tax audits in order to capitalise on the new skills acquired and enable the DGI to combat international tax evasion and avoidance more effectively. We are all the more hopeful of winning this challenge as the entry into force of the MAAC on 1 April 2023 has significantly expanded our network of EOI partners with legal instruments in force, from around 10 jurisdictions to more than 140 jurisdictions worldwide.

DGI trainers in Burkina Faso were awarded the prize for "Best ownership and sustainability of programme impact" at the first meeting of the Train the Trainer network held in Paris on 5–6 December 2023. Can you tell us more about these local initiatives and their impact?

Is the DGI planning other activities for the coming years? As part of its staff capacity–building policy, the DGI is committed to establishing a pool of experts in each area of taxation. The Train the Trainer programme has been used to achieve this objective for EOI. To this end, in addition to traditional local training courses, Burkina Faso's trainers have developed a mini "Train the Trainer" programme domestically, by training "EOI referents" in the DGI's regional departments. The aim of this initiative is to train local trainers who will in turn act as relays for the experts trained by the Global Forum in their respective regions. We want to increase knowledge of EOI by reaching a greater number of tax administration staff through awareness–raising and/or ongoing training, taking into account their level of exposure to international tax issues.

At a time when the DGI's revenue targets are constantly increasing, we hope to measure the impact of this initiative on the number and quality of requests made and, ultimately, on improving compliance and tax revenue mobilisation in Burkina Faso.

In the short and medium term, we plan to organise training sessions for tax collectors on the recovery of cross–border tax debts, and for officials involved in the land and property chain, as tax evasion and avoidance are closely linked to money laundering, which has a major impact on the estate sector.

Source: provided by DGI, Ministry of Finance, Burkina Faso in OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

BOX 6. LESOTHO – Interview with a participant of the 2023 edition of Train the Trainer

Why were you nominated by your organisation to participate in the 2023 edition of the Train the Trainer Programme?

The EOI function/process is undertaken by the International Tax Cooperation (ITC) unit of the Revenue Services Lesotho (RSL), which is manned by two officials being Manager ITC (my boss), who has already undergone the programme (Train the Trainer) in the 2022/23 financial year and Consultant – ITC (me). With that said, I feel like I was the second–best candidate for nomination for the TtT programme as EOI is one of my core responsibilities. I think my superiors understood that it is important for me to gain more knowledge and understanding in EOI and be a trainer on such, so that I can execute my daily EOI functions better and spread knowledge and awareness on EOI and encourage more use through local trainings that I was supposed to conduct.

What has been your experience and what was the impact of participating in the programme?

On the Programme I met colleagues from different jurisdictions, some from our (Lesotho) treaty partner jurisdictions from whom I learned a lot from practical experiences and information they shared.

I also gained more knowledge on some of the principles within the EOI function that were explained in more depth by the Global Forum experts.

Being trained to be a trainer was the best, (it was like a refresher course) reminded me of EOI from the perspective of Lesotho`s tax legislation (customisation of slides).

Participating in the programme turned me into a Trainer for EOI purposes and I have now trained about 30 auditors. My participation in the programme has therefore motivated me to carry out more work and spread knowledge and awareness through EOI trainings.

What are the next steps planned in Revenue Services Lesotho to continue to train staff on exchange of information building on your experience as a local trainer?

Plans are yet to be finalised and preached to our management, but I hope to train the senior management of RSL in an effort to give them knowledge and awareness with regard to EOI, maybe that will encourage more use of the function.

Source: Mr Moleko Makara, Revenue Services Lesotho (RSL)

1st meeting of the Train the Trainer Network, 5–6 December 2023, Paris, France.

BOX 7. Train the Trainer network: engaging a community to multiply opportunities

In line with the objective of the Train the Trainer programme, which is to build sustainable training resources on EOI in jurisdictions, the participants that complete the programme join a network of trainers. The network is currently made up of the 186 trainers from the 65 jurisdictions that have participated in the programme since its inception in 2021. It aims at fostering collaboration among the trainers, as well as continued development of their technical knowledge and skills.

In December 2023, the Train the Trainer network gathered for the first time in Paris, France. The event attended by 53 tax officials (including 35 women) from 25 jurisdictions proved to be a powerful gateway to further promote collaboration between trainers, share experiences and keep the Train the Trainer programme adapted to the needs of the jurisdictions. Network members present took stock of the results achieved by the programme since its inception, and how it is helping their tax administrations build sustainable EOI capacities for effective domestic resource mobilisation. The participants shared experiences in conducting successful trainings, and how these trainings have led to increased utilisation of EOI tools, such as jurisdictions sending out more requests for information. They finally explored opportunities of cooperation among themselves and discussed the next steps for the programme and how the network could foster a culture of EOI to tackle tax evasion and mobilise domestic revenues.

The network will continue to meet virtually on a periodical basis during thematic sessions to discuss specific topics on the substance of EOI or on the conducting of trainings, including presentation of case studies. In addition to thematic sessions, a Train the Trainer network platform is available to facilitate interactions among trainers including instant chats and live Q&A. The annual gathering of the network will take stock of the continued work, discuss common challenges and ways of improving the impact of the trainings on the use of EOI by tax administrations to tackle tax evasion.

Source: OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit..

Women Leaders in Tax Transparency

The Women Leaders in Tax Transparency (WLiTT) programme was launched in 2022 to empower women to take leading roles on tax transparency, as well as to act as role models in their tax authorities or ministries of finance through the establishment and development of a network of women officials from tax authorities and ministries of finance (see Box 8). The WLiTT network, launched in 2022, aims to empower women and support them to progress their careers in tax by providing a forum to discuss topical issues in the tax transparency agenda, as well as any challenges in the implementation of the EOI standards.

Women Leaders in Tax Transparency network reception, 1 December 2023, Lisbon, Portugal.

In 2023, the second edition of WLiTT gathered 24 women from 24 developing jurisdictions, including 12 participants from 12 African countries (Egypt, Eswatini, Kenya, Liberia, Mauritius, Morocco, Namibia, Nigeria, South Africa, Togo, Tunisia and Uganda). The WLiTT network held its second meeting in October 2023, which was attended by 32 laureates of 2022 and 2023 (including 16 participants from 15 African countries). The WLiTT network also held an in–person meeting in the margins of Global Forum Plenary meeting in Lisbon, Portugal in November 2023 with the participation of 12 participants among whom 4 were from 4 African countries. Box 9 highlights the transformative effect the WLiTT programme has had on increasing the participation and leadership of women in tax transparency.

Panel with partcipants from the Train the Trainer and Women Leaders in Tax Transparency programmes, 1 December 2023, Lisbon, Portugal.

BOX 8. Women Leaders in Tax Transparency 2023 programme

The 2023 edition of WLiTT organised six sessions focusing on central aspects of tax transparency, such as the standards and the broader international tax agenda, as well as leadership trainings and mentoring sessions delivered by experienced women in the tax transparency field as follows:

- **March 2023**: initial meeting focused on the Global Forum and the tax transparency standards, including beneficial ownership, with mentoring sessions by Maria José Garde, Patron of the 2023 edition, Director General of Taxes, Ministry of Finance, Spain, Chair of the European Union Code of Conduct Group and former Chair of the Global Forum (2017–2022), and by Zayda Manatta, Head of the Global Forum Secretariat.
- **April 2023**: second meeting centred on the AEOI standard and the MAAC with mentoring sessions by Grace Perez–Navarro, Patron of the first edition and former–Director of the OECD Centre for Tax Policy and Administration, and Ana Cebreiro Gomez, Senior Economist (Tax Policy), International Monetary Fund.
- **May 2023**: third meeting focused on the practical aspects of EOIR, in particular the concept of foreseeable relevance, with mentoring sessions by Huey Min Chia–Tern, Deputy Commissioner of the Inland Revenue Authority of Singapore and former Chair of the PRG (2016–2022), and Elfrieda Stewart Tamba, former Commissioner General of the Liberia Revenue Authority and former Deputy Minister of Finance of Liberia.
- **July 2023**: fourth meeting focused on the international tax agenda, with mentoring sessions by Fabrizia Lapecorella, Deputy Secretary General of the OECD, and Marlene Nembhard–Parker, Deputy Commissioner General, Legal Support Division, Jamaican Tax Administration and Co–Chair of the Inclusive Framework on BEPS.
- **September 2023**: fifth meeting centred on a leadership training for women, with the participation of a certified trainer.
- **October 2023**: final meeting of the 2023 edition with a feedback session. In addition, the first annual Women Leaders in Tax Transparency network meeting was held with a mentoring session given by Manal Corwin, Director of the OECD Centre for Tax Policy and Administration.
- **December 2023**: strengthening of the Women Leaders in Tax Transparency Network with an in person gathering in the margin of the Plenary Meeting of the Global Forum

Source: OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

BOX 9. UGANDA –Women Leaders in Tax Transparency: testimony from a participant in the 2023 edition

As a participant in the 2023 edition of the Women Leaders in Tax Transparency Program, I found the experience transformative both personally and professionally. The call for nominations resonated with me deeply, as it offered a chance to grow in my role as team lead responsible for implementation of AEOI under the Competent Authority. The opportunity to enhance my knowledge and skills while networking with women leaders from various jurisdictions at different stages of implementation of tax transparency and EOI was a compelling factor in my decision to apply.

I am grateful for the confidence that the Uganda Revenue Authority (URA) has vested in me throughout the journey since nomination all through to conclusion. With the full support of management, I was able to integrate the programme into my Key Performance Indicators, which enabled me to prioritise and attend all virtual and physical sessions, leading to a consistent and meaningful engagement in the programme. One of the highlights of my experience in the programme were the in–depth discussions on AEOI and tax transparency policy issues and best practices. This knowledge empowered me to advocate for policy changes within my organisation, implement best practices in tax and reporting compliance and raise awareness about the significance of tax transparency among stakeholders.

The networking opportunities with fellow women leaders and access to experienced mentors enriched my perspective and provided a supportive community. The mentorship component guided me through complex challenges and helped me cultivate essential leadership skills. I believe this global community of women leaders will foster collaboration and mutual support beyond the programme.

Looking ahead, the WLITT programme will augment URA's interest in gender and equity through tailored leadership development programs, mentorship opportunities, and targeted training initiatives. By fostering a supportive system for women leaders, the URA aims to promote gender diversity and drive progress in the field. As women who have been accorded a rare opportunity to contribute to creation of sustainable domestic resource mobilisation through tax transparency, we are ready to domesticate the program through a local chapter of women leaders starting with the Competent Authority office.

Source: Phioner Nangalama, Uganda Revenue Authority (URA)

A network to enhance co–operation on information security management

The information security management (ISM) network was launched in 2021 as a platform for Global Forum members to share best practices and experiences, creating a community to improve confidentiality and data safeguards (CDS) frameworks. It currently gathers more than 230 nominated representatives from 76 jurisdictions – including 44 officials from 10 African countries. The work of the ISM Network is supported by the participation of the 38 members from 27 jurisdictions of the Expert Panel on CDS (including 5 expert panel members from 4 African countries)

To facilitate discussions among members, the ISM Network launched the "ISM Network Live Hour", which gathers the network's experts on a quarterly basis to discuss keyISM topics. Since its launch in December 2021, the "ISM Network Live Hour" has held seven sessions. It held three sessions in 2023 with the attendance of 265 ISM experts covering the following topics:

- information classification and handling in March 2023 (with 14 officials from 7 African countries)
- effective monitoring of logs for critical suspicious activities in May 2023 (with 17 officials from 6 African countries)
- effective protection from exfiltration of exchanged data in September 2023 (with 17 officials from 8 African countries).

Following demand for more extensive content on ISM topics, in October 2023 the Secretariat organised the first ISM Day, a virtual conference for information security officers from the tax authorities of member jurisdictions. This event covered four key topics with presentations from the Secretariat's in–house ISM advisors and the contribution of 13 panellists (including a panellist from an African country): (i) information security governance,

"Ghana's initial attempt to address the Core Requirement on CDS as part of implementation of the CRS faced challenges due to inadequate information, guidance and materials regarding jurisdictions' implementation of the CDS requirements.

With the launch of the Global Forum's ISM network and release of associated materials, such as the ISM toolkit and the model ISM Framework with domain–specific policies for member countries, the Ghana Revenue Authority (GRA) was able to adopt these materials and developed an ISM framework and domain–specific policies for the maintenance of information security within the secure perimeter in collaboration with relevant outfits in the Authority.

Additionally, the quarterly ISM live hour events organized by the Secretariat, where relevant topics on ISM are discussed with practical experiences shared from mature peers, has immensely benefitted our team who is member of the ISM Network.

We have highly benefited from the live hour session on "logging and monitoring" as we could immediately reflect on some of the aspects presented for the improvement of our practices in GRA in line with the suggested improvement from the CDS assessment. Conclusively, lessons learnt from addressing the CDS requirements in the secure perimeter has helped in improving the ISM posture in the Authority's enterprise environment.

We look forward to the events in 2024 and are appreciative of the Global Forum's expansion of the number of nominees that can take part in the activities of the ISM Network which we intend to take advantage of to involve more of our team."

Ammishaddai Owusu–Amoah, former Commissioner General, Ghana Revenue Authority (October 2019 – March 2024) in OECD (2024), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

(ii) cyber risks, (iii) secure perimeter, and (iv) remote working. The ISM Day was attended by 570 officials from 121 jurisdictions, including 72 officials from 21 African countries.

CROSS–BORDER ASSISTANCE IN THE RECOVERY OF TAX CLAIMS

Strengthening African countries frameworks for CBAR is high on the Africa Initiative's agenda and has been a priority during the 2021–2023 period. In 2023, the Africa Initiative has continued to develop its work on CBAR, which started in 2021 with the establishment of a dedicated Working Group and the adoption of a fact finding note to understand the current position of African countries and ascertain the conditions necessary for effective CBAR on the continent.[7] In particular, a work plan was adopted to address the main recommendations made in the note:

- strengthening domestic tax debt recovery functions
- developing a strategy for CBAR
- adopting an appropriate international legal basis for CBAR.

A Toolkit for Establishing a Function for Cross–Border Assistance in the Recovery of Tax Claims[8] aimed at providing tax authorities with practical guidance for participating in this form of administrative assistance was launched at the 13th Africa Initiative meeting in Cape Town, South Africa in July 2023.

In addition, two regional workshops were organised for or with the participation of African countries in 2023 to spread awareness on this form of administrative cooperation:

- The Global Forum Secretariat and ATAF jointly delivered the first regional workshop on CBAR for African countries. The workshop took place from 27 to 29 March 2023 in Kampala, Uganda and brought together 61 tax officials from 19 African countries.

7. The Working Group was comprised of 24 officials from 12 African countries and received support from partner countries (Belgium and Japan). A summary of the findings of the Working Group is available at https://www.oecd.org/tax/transparency/documents/cross–border–assistance–recovery–of–tax–claims–african–countries.pdf.

8. OECD (2023), *A Toolkit for Establishing a Function for Cross–Border Assistance in the Recovery of Tax Claims*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/a–toolkit–for–establishing–a–function–for–cross–border–assistance–in–the–recovery–of–tax–claims.pdf. It is available in English, French and Spanish.

- The Global Forum Secretariat, the CREDAF and the International Association of Treasury Services partnered to deliver a second workshop on CBAR hosted by the French tax administration from 10 to 12 July 2023 in Noisy–le–Grand, France. This workshop was attended by 46 representatives from 18 countries, including 27 participants from 14 African countries.

These workshops enhanced awareness and facilitated peer–to–peer learning among African tax authorities on the best practices for CBAR with participants stressing the importance of this form of administrative assistance as a complement to EOI, to ensure that the mobility of taxpayers and their assets does not hamper the recovery of due taxes.

PARTNERSHIPS TO SUPPORT AFRICAN COUNTRIES

The Africa Initiative is supported by 17 partners and donors, who continued to sustain its activities in 2023. Support for the Initiative's activities from Africa's continental institutions and organisations – the AU Commission, the AfDB and ATAF – and regional and other organisations, such as WATAF and CREDAF, was critical to sustaining the message on the relevance of tax transparency and EOI as a tool for fighting IFFs and building capacity of African tax authorities. Support from the donor community, namely from the European Union, France, Germany, Ireland, The Netherlands, Norway, Sweden, Switzerland and the United Kingdom, was essential to developing country–specific projects to strengthening legal and institutional frameworks for tax transparency and EOI. The World Bank and the IFC also endorsed the African Initiative's activities and worked with the Secretariat to strengthen the collaboration in Africa.

In addition to collaboration with the 17 partners and donors, the Africa Initiative received technical support from Belgium through expertise sharing during its activities in 2023. Table 6 summarises the collaboration with partners in 2023.

Box 10 shows the impact of the Fiscal Transition Support Programme in West Africa (PATF) on advancing tax transparency and EOI in West Africa, supported by the European Union and the Global Forum Secretariat. Box 11 illustrates the impact of support from Africa Initiative partners in advancing tax transparency and EOI in Africa.

14th meeting of the Africa Initiative, 28 November 2023, Lisbon, Portugal.

Launch of the case study on "Combating tax evasion, avoidance, and illicit financial flows to mobilise domestic resources in West Africa", 29 November 2023, Lisbon, Portugal.

TABLE 6. **Flagship initiatives by Africa Initiative's partner**

Partner	Initiative	Impact
AU Commission	TTiA report co–authorship	Continental
ATAF	TTiA report co–authorship	Continental
	Joint capacity–building activities on transparency and EOI for African countries	Country Specific
	Joint capacity–building work on cross–border assistance in the recovery of tax claims	Continental
AfDB	Pilot project to support Senegal in establishing its legal and institutional framework for AEOI and improve the use of EOIR in its tax compliance activities	Country Specific
	Public Financial Management Capacity Development programme that comprises six critical areas including DRM and Accountability, Transparency and Curbing of Corruption and IFFs	Continental
CREDAF	Workshop on CBAR	Regional
	Seminar on beneficial ownership	Regional
European Union	Support to Global Forum technical assistance programme	Continental
	West Africa Fiscal Transition Support Programme	Regional
	Capacity building activities for Tunisia	Country Specific
France	Support to Global Forum technical assistance programme	Continental
	Workshop on CBAR	Regional
	AEOI implementation pilot project in Morocco	Country Specific
Ireland	Support to Global Forum technical assistance programme	Continental
Netherlands	Support to Global Forum technical assistance programme	Continental
Norway	Support to Global Forum technical assistance programme	Continental
Switzerland	Support to Global Forum technical assistance programme	Continental
	AEOI project technical support to Tunisia	Country Specific
United Kingdom	Support to Global Forum technical assistance programme	Continental
	Implementation of AEOI for Kenya and Uganda	Country Specific
WATAF	High–level policy dialogue	Regional

Source: Global Forum Secretariat.

BOX 10. ECOWAS – Cooperation with and support from the European Union to advance tax transparency and EOI in West Africa

In 2023, the Fiscal Transition Support Programme in West Africa (PATF), supported by the European Union and the Global Forum Secretariat, made significant strides in combating tax evasion and illicit financial flows and enhancing domestic resource mobilisation in the region.

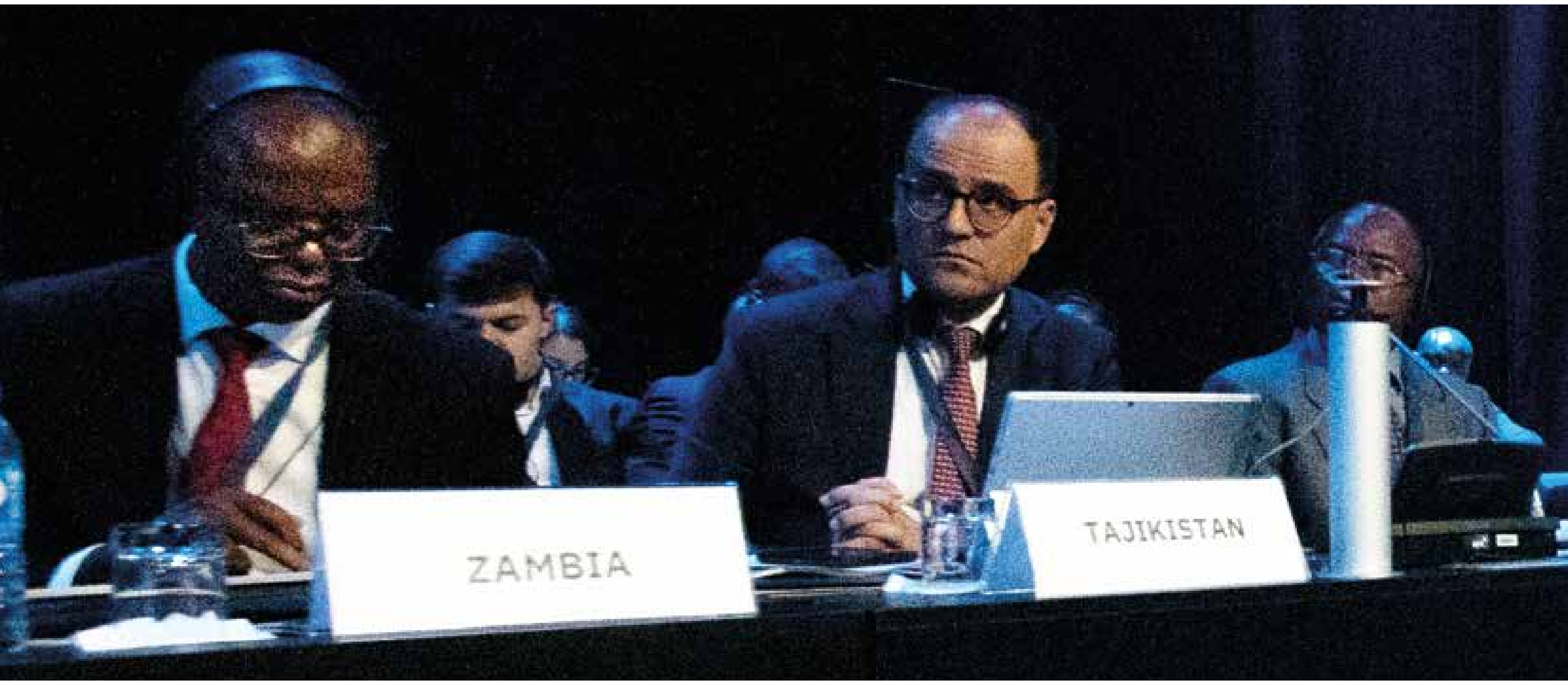
A notable achievement was ECOWAS's adoption of two important tax instruments.* During its 90th session in July in Bissau, Guinea–Bissau, the ECOWAS Council of Ministers ratified the Directive C/DIR.2/07/23, which requires the identification and registration of beneficial owners of legal entities and arrangements. This directive is designed to establish a comprehensive framework to combat tax fraud and money laundering by making beneficial ownership information readily accessible to relevant authorities.

Moreover, the Supplementary Act A/SA.3/07/23 on Mutual Administrative Assistance in Tax Matters was enacted during the 63rd ordinary session of the ECOWAS Conference of Heads of State and Government on 9 July 2023, also in Bissau. This Act significantly enhances administrative cooperation among ECOWAS Member States through mechanisms such as EOI and cross–border assistance in the recovery of tax claims.

These legal and regulatory changes were supported by capacity building initiatives. From 30 January to 2 February 2023, a workshop was held in Abidjan for tax officials from West African countries to examine how EOI could be effectively integrated into their existing tax audits and investigations. This seminar concluded a series of training on EOI that spanned from 2020 to 2023. Additionally, on 18 July 2023, a seminar in Accra, Ghana, brought together representatives from tax authorities, anti–money laundering units, and civil society organisations to discuss progress made under PATF in terms of tax transparency and the fight against illicit financial flows. The seminar underscored the successful adoption of the directive on beneficial ownership and the supplementary act on mutual administrative assistance, both of which will markedly improve tax transparency and administrative cooperation across the region.

Source: Global Forum Secretariat.

* OECD (2023), *Combating tax evasion, avoidance, and illicit financial flows to mobilise domestic resources in West Africa*, OECD, Paris, https://www.oecd.org/tax/transparency/documents/combating–tax–evasion–avoidance–and–illicit–financial–flows–to–mobilise–domestic–resources–in–west–africa.pdf.



BOX 11. **TUNISIA – Progress made through support from the European Union**

In 2023, significant progress was made by Tunisia under the EU funded programme, specifically within the component "Assisting Tunisia in effectively using information exchange instruments for tax purposes and implementing the automatic exchange of information standard for tax purposes."

Regarding the implementation of the AEOI standard, for which Tunisia has committed to exchange for the first time in 2025, Global Forum experts intensified their collaboration with Tunisian officials on confidentiality and data protection through nine virtual meetings following an initial assistance report transmitted in December 2022. Additionally, an on–site mission in Tunis from 2 to 6 October 2023, convened key stakeholders in information security to conduct a mock on–site review. This mission also focused on establishing a "secure perimeter" allowing Tunisia to concentrate efforts on security measures relating to processes, people, systems, and services involved in AEOI, thereby quickly meeting international requirements and progressively enhancing overall information security at the Directorate General of Taxes (DGI). A second assistance report was sent to Tunisia in November 2023, to highlight the action plan to be implemented, both for the secure perimeter and the whole tax administration, to achieve a positive assessment.

Moreover, Global Forum experts supported the development of both national and international legal frameworks for AEOI through four technical virtual meetings in 2023 and by sharing relevant information and comments. Tunisia is supported by Switzerland and the Global Forum Secretariat in a pilot project for the implementation of AEOI.

Regarding other types of information exchanges, the Global Forum Secretariat provided Tunisia with a report suggesting legal and operational improvements to enhance their use, while noting that Tunisia has already a strong practice of EOIR. Proposed enhancements included better legal consideration of typical response times in EOIR and their impact on tax audit procedures, the potential use of other forms of cooperation such as spontaneous information exchange, simultaneous audits, or tax examinations abroad, strengthening the links between the detection of international tax evasion cases and administrative cooperation, and a broader use of information received by non–tax authorities, while adhering to confidentiality rules.

Source: Global Forum Secretariat

16th Global Forum plenary meeting,
29 November - 1 December 2023,
Lisbon, Portugal

3

African countries' progress in implementing the tax transparency standards

Since 2014, the tax transparency agenda has greatly advanced in Africa. More remains to be done to ensure the effective implementation of, and benefits from, the standards of transparency and exchange of information in African countries' domestic resource mobilisation efforts.

STRENGTHENING INFRASTRUCTURES FOR EXCHANGE OF INFORMATION ON THE CONTINENT

To effectively participate in and benefit from the implementation of the tax transparency standards, a country must invest in a minimum level of EOI infrastructure. This includes a broad network of EOI agreements that provides an international legal gateway for cooperation with foreign tax authorities, an enabling domestic legal framework and an appropriate administrative operational structure.

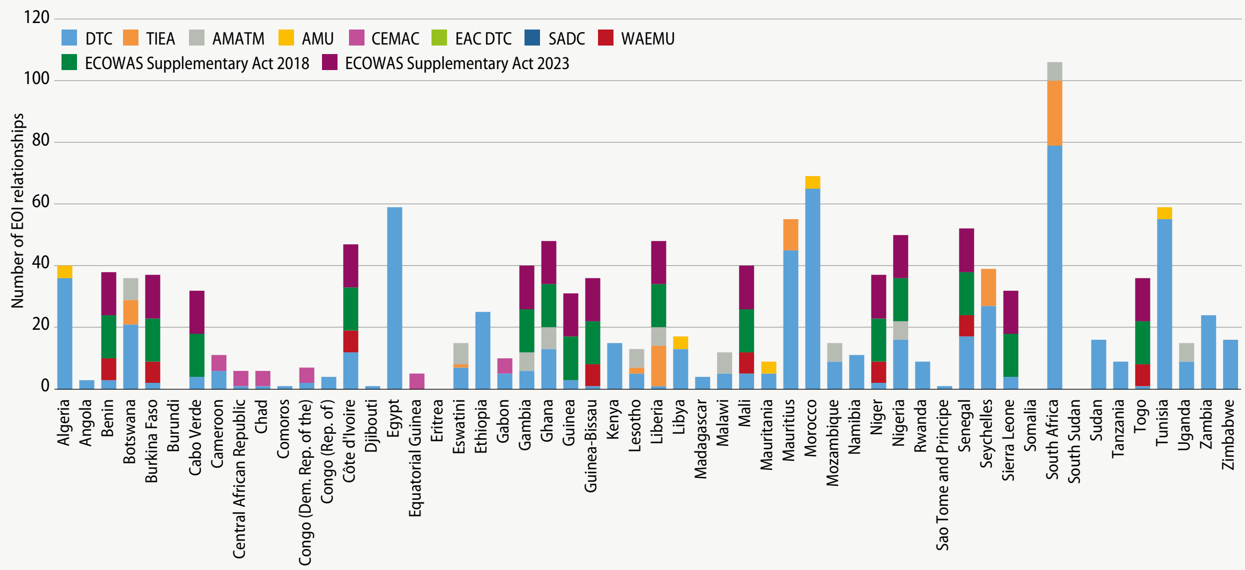
Broadening exchange of information networks

EOI, like all forms of international cooperation in tax matters, must be anchored in an enabling international legal instrument. A country with a wide network of EOI instruments can access information needed for tax purposes from many foreign jurisdictions. Consequently, one of the main objectives of the Africa Initiative is to help African countries widen their EOI networks to enable them request information from as many jurisdictions as possible.

As of 31 December 2023, African countries have entered into 1 849 bilateral EOI relationships based on bilateral or regional agreements, that take the form of double taxation conventions (DTCs), tax information exchange agreements (TIEAs) and regional agreements[1], of which 1 347 are in force (see Figure 3).

Although the bilateral and regional agreements shown in Figure 3 provide a legal basis for EOI, not all of them are in line with the standard as reflected in the model provision in Article 26 of the OECD Model Tax

FIGURE 3. **Bilateral and regional instruments for exchange of information in force in African countries (by type)**

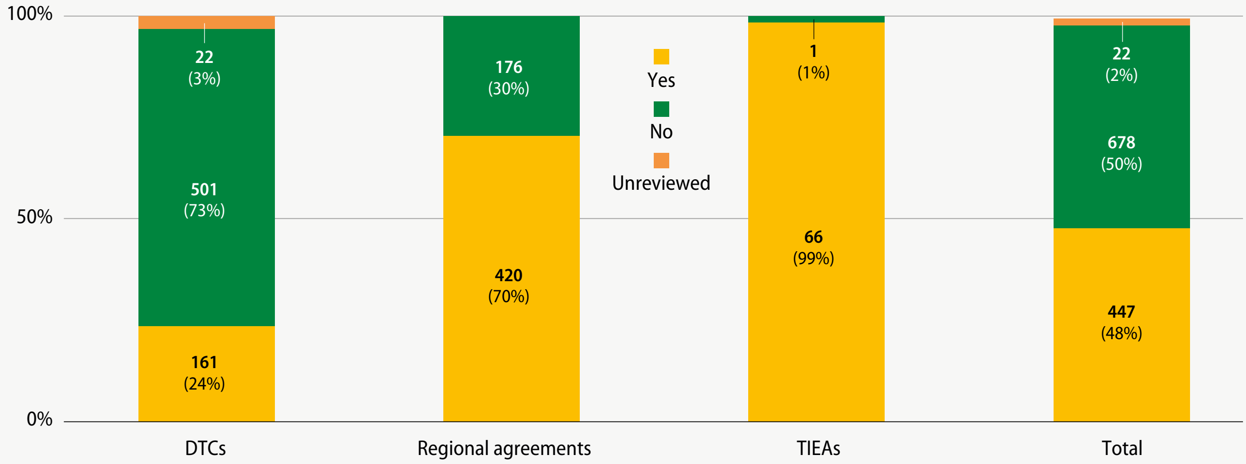


Note: Bilateral agreements include double tax conventions (DTCs) and tax information exchange agreements (TIEAs). Regional agreements include all agreements listed in Footnote 1.

Source: Analysis done by the Global Forum Secretariat based on publicly available information.

1. These include the ATAF Agreement on Mutual Administrative Assistance in Tax Matters (the AMATM); the Convention for the Avoidance of Double Taxation and the Establishment of Rules for Mutual Assistance in respect of Taxes on Income between the States of the Arab Maghreb Union (AMU); the Southern Africa Development Community's Agreement on Mutual Assistance in Tax Matters (SADC Agreement); the Economic Community of West African States (ECOWAS) Supplementary Act n°5/12/18 Adopting Community Rules for the Elimination of the Double Taxation with Respect to Taxes on Income, Capital and Inheritance and the Prevention of Tax Evasion and Avoidance within the ECOWAS Member States (ECOWAS Supplementary Act 5/12/18); the Central African Economic and Monetary Community (CEMAC) Regulation n°07/19 of 7 April 2019, revising Act n°5/66 of 13 December 1966 on the avoidance of double taxation; the East African Community (EAC) Double Taxation Convention; the West African Economic and Monetary Union (WAEMU) Regulation No. 08/2008 adopting rules for the avoidance of double taxation within WAEMU and rules on assistance in tax matters and Supplementary Act A/SA.3/07/23 on Mutual Administrative Assistance in Tax Matters between ECOWAS member States (ECOWAS Supplementary Act A/SA.3/07/23).

FIGURE 4. **Percentage of African countries' instruments for exchange of information meeting the standard (by type, MAAC not included)**



Note: The figure shows the number of EOI instruments that meet the EOI standard, based on exploitable data, and the corresponding percentage in brackets. 22 DTCs are not available in English or French and could not be analysed, hence they are referred to as "unreviewed".

Source: Analysis done by the Global Forum Secretariat, based on publicly available information.

Convention on Income and Capital (OECD Model Tax Convention)[2] and the United Nations Model Double Tax Convention between Developed and Developing Countries (UN Model Tax Convention).[3] As shown in Figure 4, 50% of the bilateral and regional agreements concluded by African countries that provide for international co–operation in tax matters do not allow for EOI to the full extent permitted by the EOIR standard. Moreover, bilateral agreements such as DTCs require negotiating the allocation of taxing rights between countries and is a resource intense exercise.

Joining multilateral agreements for international cooperation in tax matters, such as the MAAC, is a more effective way for a country to rapidly expand its EOI network without devoting significant resources and time to negotiating bilateral agreements with each jurisdiction it wants to cooperate with or joining regional agreements that are limited to specific regions whereas tax evasion is a global problem. In addition to being in line with the EOIR standard and providing for AEOI and other forms of international cooperation in tax matters[4], the MAAC is the widest–reaching multilateral EOI agreement, counting 147 participating jurisdictions[5], out of which 141 had it in force as of 31 December 2023.

Since 2014, the Africa Initiative has supported African countries to rapidly expand their network of EOI agreements by joining the MAAC, including providing technical assistance in the signing and ratification process. In 2023, Benin completed its domestic ratification processes and deposited its instrument of ratification, bringing the MAAC into force in 2023. The MAAC also came into force for Burkina Faso, who deposited its instrument of ratification in December 2022. As of 31 December 2023, 20 African countries had ratified and brought the MAAC into force, compared to 18 in 2022 (see Table 7). Three other African countries have either started the process of joining the MAAC or have been invited to sign it.

2. OECD (2017), *Model Tax Convention on Income and on Capital: Condensed Version 2017*, OECD Publishing, Paris, https://doi.org/10.1787/mtc_cond–2017–en.
3. UN (2017), *Model Tax Convention between Developed and Developing Countries*, UN, New York, https://www.un.org/esa/ffd/wp–content/uploads/2018/05/MDT_2017.pdf.
4. More information on the forms of assistance possible under the MAAC and the process for joining it is available in a toolkit prepared with the support of the Secretariat of the Co–ordinating Body of the Convention and the OECD's Directorate of Legal Affairs: OECD (2020), *A Toolkit for Becoming a Party to the Convention on Mutual Administrative Assistance in Tax Matters*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris – https://www.oecd.org/tax/transparency/documents/MAAC–toolkit_en.pdf.
5. As of April 2024, there are 147 participating jurisdictions. More information on the jurisdictions participating to the MAAC is available at https://www.oecd.org/tax/exchange–of–tax–information/Status_of_convention.pdf.

Benin

"Benin decided to become a party to the MAAC in order to strengthen its international cooperation in tax matters and promote transparency domestically. By acceding to this convention, Benin undertakes to collaborate more closely with other jurisdictions on tax matters, thereby helping combat tax evasion, tax fraud and other harmful practices.

The entry into force of this convention for Benin on 1 May 2023 means that the country now fully participates to international tax cooperation. This reinforces Benin's credibility as a committed partner in the fight against abusive tax practices, and facilitates the exchange of tax information with other signatory jurisdictions.

To make the most of this convention, Benin's tax administration intends to implement several initiatives such as setting up domestic mechanisms to facilitate the exchange of information, assigning dedicated staff to the EOI Unit and training staff to ensure effective use of the instruments provided for in the MAAC. In addition, Benin's General Directorate of Taxes is planning awareness–raising activities to inform taxpayers and stakeholders of the implications and benefits of joining the MAAC. All these measures will strengthen Benin's international cooperation in tax matters and promote more transparent and efficient tax administration."

Nicolas Yenoussi, Director General of Taxes, Benin

Zimbabwe

"'Zimbabwe is looking forward to joining the MAAC and fully benefit from exchange of information at global level. We appreciate all the support Zimbabwe is getting in the journey to join MAAC. We are now living in a highly digitalized and globalized village where information on tax matters needs to be shared across nations within a short period of time. Joining MAAC offers this wide opportunity rather than relying on bilateral treaties."

Regina Chinamasa, Commissioner General, Zimbabwe Revenue Authority

TABLE 7. **Participation of African countries in the Convention on Mutual Administrative Assistance in Tax Matters, as on 31 December 2023**

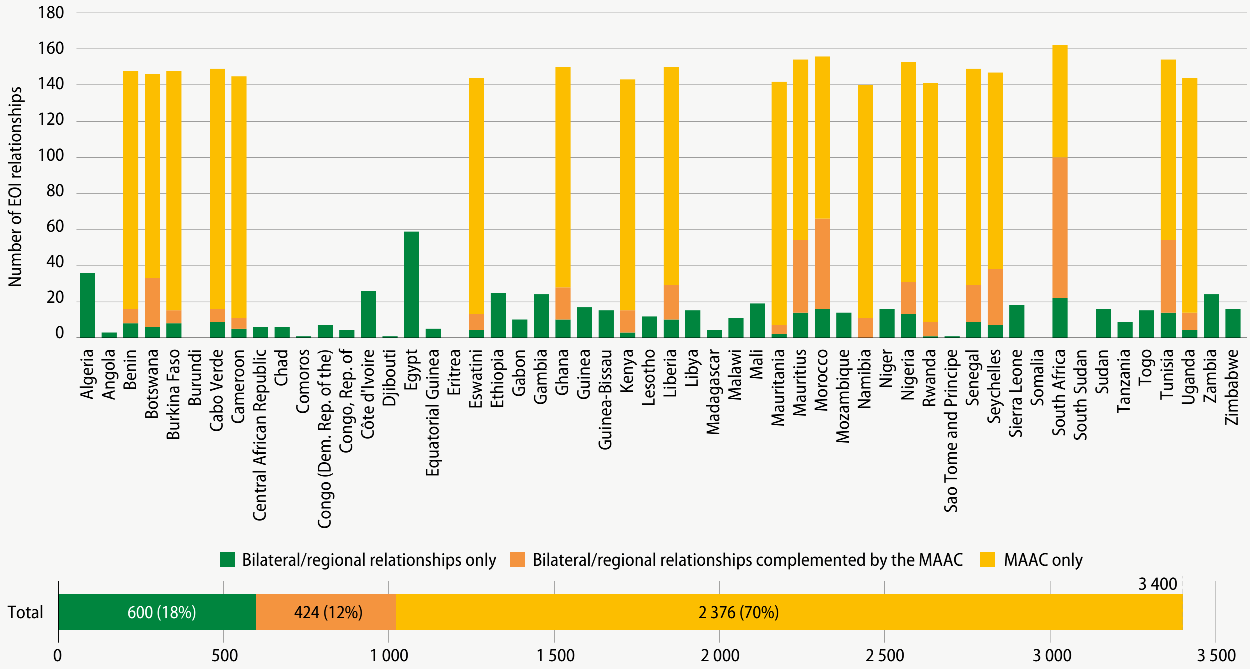
Country	Status
Angola	Invitation to sign the MAAC (2021)
Benin	In force (2023)
Botswana	In force (2021)
Burkina Faso	In force (2023)
Cabo Verde	In force (2020)
Cameroon	In force (2015)
Eswatini	In force (2021)
Gabon	Signed (2014)
Ghana	In force (2013)
Kenya	In force (2020)
Liberia	In force (2021)
Madagascar	Signed (2022)
Mauritania	In force (2022)
Mauritius	In force (2015)

Country	Status
Namibia	In force (2021)
Morocco	In force (2019)
Nigeria	In force (2015)
Rwanda	In force (2022)
Senegal	In force (2016)
Seychelles	In force (2015)
South Africa	In force (2014)
Togo	Signed (2020)
Tunisia	In force (2014)
Uganda	In force (2016)

Note: Gabon (2014), Togo (2020) and Madagascar (2022) have signed the MAAC but not yet deposited their instruments of ratification. Angola has been invited to sign the MAAC since 2021.

Source: Jurisdictions participating in the MAAC – https://www.oecd.org/tax/exchange-of-tax-information/Status_of_convention.pdf

FIGURE 5. **African countries' exchange of information relationships in force**



Note: This figure only takes into account EOI agreements that are in force.

Source: Analysis done by the Global Forum Secretariat based on publicly available information.

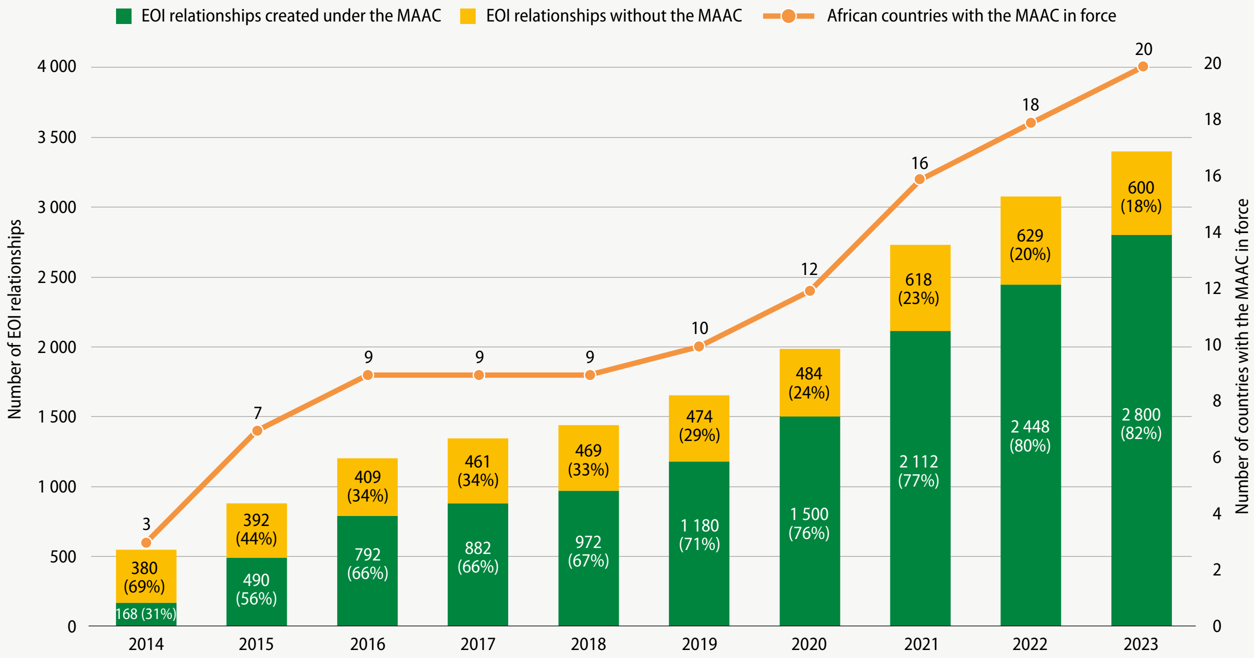
Signing the MAAC, completing the domestic ratification processes and depositing the instrument of ratification has had a significant impact on the number of EOI relationships in force for African countries (see Figure 6). As of 31 December 2023, African countries had 3 400 EOI relationships in force, of which 2 376 are built on the MAAC, 424 are bilateral/regional relationships also covered by the MAAC and 600 are bilateral/regional relationships not covered by the MAAC (see Figure 5). Out of the 3 400 EOI relationships, the MAAC covers a total of 2 800 EOI relationships.

Despite the obvious benefits of joining the MAAC, only 23 African countries (all members of the Global Forum/ Africa Initiative) have signed the convention: more than half of African countries are not yet signatories and cannot make use of the extensive forms of international cooperation in tax matters it facilitates. In general, all the African countries with a wide EOI network are members of the Global Forum because they realise the importance of a wide EOI network and receive support to broaden their EOI networks. African countries who are not members of the Global Forum tend to have a narrow network of EOI relationships (see Figure 5).

Out of the 23 African countries that have signed the MAAC, three (Gabon, Togo and Madagascar) are yet to complete their domestic ratification procedures and deposit their instruments of ratification. Signing the MAAC marks an important step towards broadening EOI networks, while completing the domestic ratification processes and depositing the instruments of ratification brings the MAAC into force thus ensuring the country has activated a wide network of EOI relationships, which may be used for cooperation with foreign tax authorities.

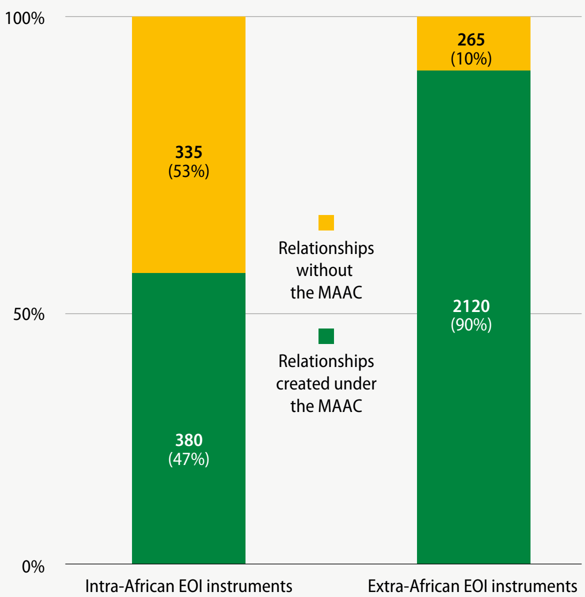
As seen in Figure 7, African countries have more EOI relationships with countries outside the continent (extra–African EOI relationships) than with other African countries (intra–Africa EOI relationships). Moreover, most of the intra–Africa EOI relationships are created through joining the MAAC, which also widens the extra–Africa EOI relationships of African countries. African countries are therefore encouraged to join this global instrument that facilitates many forms of administrative cooperation in tax matters and has the widest reach in terms of participating jurisdictions, including African countries.

FIGURE 6. **Number of exchange of information relationships in force established by African countries since 2014 (worldwide)**



Source: Analysis done by the Global Forum Secretariat based on publicly available information.

FIGURE 7. **Intra–African and extra–African exchange of information relationships (as on 31 December 2023)**



Source: Analysis done by the Global Forum Secretariat based on publicly available information.

14th meeting of the Africa Initiative – 28 November 2023, Lisbon, Portugal.

Enhancing the function for exchange of information in Africa

A good administrative framework plays a key role in enabling a country to meet its obligations under the international standards, which include sending quality requests and processing requests received from treaty partners in a timely manner, while safeguarding the confidentiality of exchanged information. An effective administrative framework for EOI requires:

- The delegation of the competent authority (CA) powers for EOI from the minister responsible for finance – as generally mentioned in EOI agreements – to appropriate operational levels within the tax authority. This delegation increases the operational efficiency and effectiveness of the EOI processes.
- The establishment of a dedicated EOI function responsible for managing the day–to–day EOI operations.
- The development and documentation of procedures and processes (EOI manual) that ensures that requests from treaty partners are handled as per the expectations of the international standards and that the confidentiality of the information received is safeguarded.
- The development of tools that assist the EOI function to monitor the handling of requests and measuring the impact of EOI on DRM.

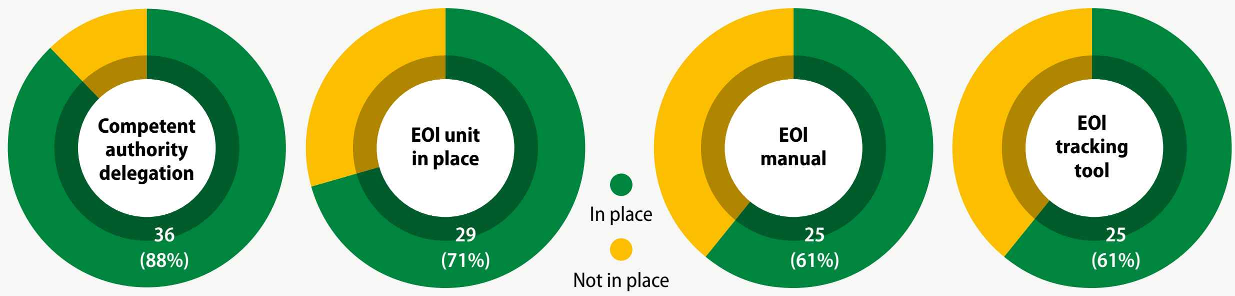
In 2023, African countries continued to improve their EOI infrastructures (see Figure 8). In total, 36 out of 41 African countries that responded to the survey have delegated the CA powers and functions to the tax authority. However, only 29 have established a dedicated unit to manage the EOI functions. Moreover, only 25 have documented the EOI processes and procedures in an EOI manual and another 25 have a tracking tool to monitor the handling of EOI requests.

The feedback from the survey indicates disparities between members and non–members of the Global Forum as well as between older and newer members. Of the five African countries that have not delegated the CA powers to the tax authority, two are non–members, and two are new members of the Global Forum. Similarly, of the 12 African countries that do not have an EOI unit, 3 are non–members and the remaining 9 joined the Global Forum in recent years. Likewise, of the 16 African countries that do not have an EOI manual or do not have an EOI tracking tool, 3 are non–members and the remaining 13 are countries that joined the Global Forum recently. In general, non–members of the Global Forum and Africa Initiative have advanced less in the establishment of EOI infrastructures compared to the members. Similarly, newer members of the Global Forum seem to be at the nascent stage of putting in place EOI infrastructures compared to older members.

The Africa Initiative will continue to support African countries to improve the organisation of their administrative structures to facilitate them implementing and benefiting from the international standards.

The effectiveness and efficiency of the EOI function is dependent on the tax authority deploying knowledgeable and skilled staff to manage it. The African countries that responded to the survey reported deploying 193 officials

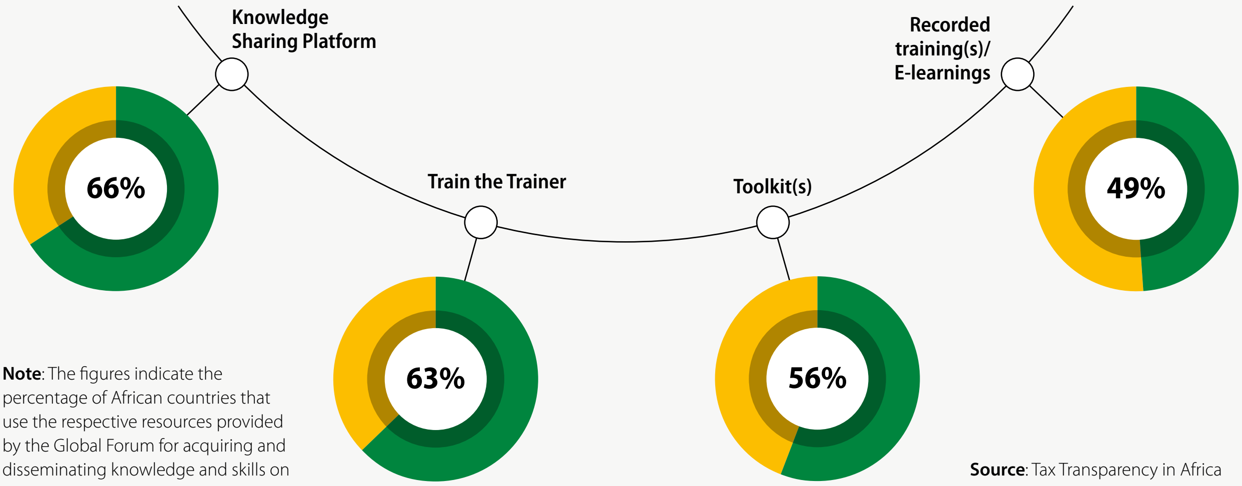
FIGURE 8. **African countries' infrastructure for exchange of information (2023)**



Note: This graph reflects the situation of 41 countries that responded to the Tax Transparency in Africa Survey 2024.

Source: Tax Transparency in Africa Survey 2024.

FIGURE 9. **Percentage of African countries using Global Forum resources for acquiring and disseminating knowledge and skills on exchange of information**



Note: The figures indicate the percentage of African countries that use the respective resources provided by the Global Forum for acquiring and disseminating knowledge and skills on exchange of information.

Source: Tax Transparency in Africa Survey 2024.

to the EOI function in 2023, of which 135 (70%) are fully dedicated to EOI, while 58 (30%) support EOI functions while handling other responsibilities.

To make use of established EOI infrastructures, the tax authority needs to raise awareness on the potential of EOI amongst tax auditors and other compliance officials, as well as when and how they can use EOI. In 2023, African countries held 85 internal training events which facilitated knowledge transfer to 1 711 officials (see Table 8). The Train the Trainer Programme has significantly contributed to the sustainable dissemination of knowledge to officials of tax authorities that participated in the programme (see Box 5. *Burkina Faso – Three years' experience of the Train the Trainer programme and local initiatives*).

The level of EOI knowledge in the tax authority can be one of the drivers of the increase in the number of requests sent. In total, over 78% of the 41 African countries that responded to the related question rated their EOI knowledge as high or medium. The countries reporting a high level of EOI knowledge (17%) have a corresponding high level of EOI activity, having sent 20 or more requests in 2023. While the group of countries that reported a medium level of EOI knowledge (60%) contains a mix of countries with high, medium and low levels of EOI activity, the countries that reported a low level of EOI knowledge (22%) have also a low level of EOI activity, having sent less than 20 requests or none in 2023.

The African countries with a high and medium level of EOI knowledge reported benefitting from workshops and seminars organised by the Global Forum Secretariat, ATAF, CREDAF, WATAF and other partners of the Africa Initiative, including from the Train the Trainer programme which facilitated knowledge sharing by local experts. The predominant methods for disseminating EOI knowledge within African tax authorities is the Knowledge Sharing Platform (KSP)[6], followed by local training sessions delivered by local trainers under the Train the Trainer programme, toolkits and recorded trainings or e–learnings (see Figure 9).

TABLE 8. **Domestic capacity building on exchange of information in Africa**

Number of events/staffs trained	2021	2022	2023
Number of training events held for tax auditors/EOI staff	37	73	83
Number of tax auditors/ EOI staff trained	1 193	1 613	1 601

Note: The figures are based on response of 41 countries who responded to the question in the survey.

Source: Tax Transparency in Africa Survey 2024.

6. The Global Forum's e–learning courses are available at https://www.oecd.org/tax/transparency/resources/global–forum–e–learning.htm.

IMPLEMENTATION OF THE STANDARD FOR EXCHANGE OF INFORMATION ON REQUEST

All members of the Global Forum are committed to implement the EOIR standard and to be monitored and peer reviewed. The peer review consists of an assessment of the country's legal and regulatory framework for EOIR and the effectiveness of its practical implementation.[7] The monitoring and peer review processes provide assurance to Global Forum members that all jurisdictions are properly implementing the standards and highlight areas where more needs to be done.

Peer reviews of the standard on transparency and exchange of information on request

The Global Forum's EOIR peer review process is now in its second round (Round 2). The first round of reviews (Round 1) was conducted against the EOIR Terms of Reference (ToR) adopted in 2010.[8] The ongoing Round 2 reviews are conducted against the EOIR ToR that were revised and enhanced in 2016 which introduced, among other changes, the requirement for jurisdictions to ensure the availability of beneficial ownership information of legal persons and arrangements, and of bank accounts.[9]

In 2023, the Global Forum released the Round 2 review reports of six African countries. Three of them (Lesotho, Mauritania and Togo) were only subject to a review of their legal and regulatory framework for EOIR (Phase 1 review) due to a limited experience in EOI, having received and processed few or no EOI requests, in accordance with the peer review methodology. An overall rating will be assigned to them after the review of the effectiveness of the practical implementation of their legal and regulatory frameworks in 2026 (Phase 2 review). The remaining three African countries (Botswana, Nigeria and Seychelles) were subject to a review of their legal and regulatory frameworks for EOIR and an assessment of the effectiveness of its practical implementation (combined or full review). Nigeria obtained a satisfactory overall rating of "Largely Compliant". Botswana and Seychelles underwent a supplementary review.[10] Following the technical support received for the Global Forum Secretariat, Botswana upgraded its overall rating to "Largely Compliant" up from the "Partially Compliant" rating achieved in 2019. However, while Seychelles made progress and improved the individual ratings of several elements compared to the ratings it obtained in 2020, the overall progress was not sufficient and it maintained an overall rating of "Partially Compliant". Seychelles is working with the Global Forum Secretariat to address the identified gaps and recommendations from its peer review reports to request another supplementary review.

Table 9 provides a summary of the compliance ratings of African members against the EOIR standard.[11] As at 7 May 2024:

- Out of the 39 African members of the Global Forum, 20 have been assessed in either Round 1 or Round 2 of reviews.
- 18 African members have been assessed in the Round 2 reviews, out of which 12 have been subjected to a full review, 6 have been subjected to a review of the legal and regulatory framework only

7. The peer review takes the form of a combined review or a phased review. A combined review, which is the default option of review in Round 2, is a simultaneous review of both the legal and regulatory framework and the practical implementation of this framework by the jurisdiction. It implies the organisation of an onsite visit a couple of months after the launch of the review. A phased review is a review with two phases: the first phase aims at assessing the legal and regulatory framework (Phase 1), and the second phase aims at assessing the implementation of this framework in practice (Phase 2). In the context of a phased review, the onsite visit is organised only during the second phase of the review, which would take place a few years after the Phase 1 review.
8. All the EOIR peer review reports published since 2010 are available at https://www.oecd-ilibrary.org/taxation/global-forum-on-transparency-and-exchange-of-information-for-tax-purposes-peer-reviews_2219469x.
9. The 2016 EOIR ToR introduces a requirement that beneficial ownership information be available for EOIR purposes in respect of legal persons (e.g. companies, foundations and limited liability partnerships) and legal arrangements (e.g. trusts). Other improvements were introduced regarding the coverage of enforcement measures and record retention periods, foreign companies, rights and safeguards, and the completeness and quality of EOI requests and responses. The ToR is available at https://www.oecd.org/tax/transparency/documents/handbook-for-peer-reviews-on-transparency-and-exchange-of-information-on-request.pdf.
10. In accordance with paragraph 85 of the 2016 ToR, where a jurisdiction that received a non-satisfactory overall rating (Partially Compliant or Non-Compliant) has made significant improvements by addressing the recommendations made by the Global Forum, it should have the opportunity to have these improvements evaluated by the Global Forum and any determinations or ratings updated accordingly by undergoing a supplementary review.
11. A summary of the compliance ratings of all Global Forum members in Round 1 and Round 2 of reviews against the EOIR standard is available at https://www.oecd.org/tax/transparency/documents/exchange-of-information-on-request-ratings.htm.

TABLE 9. **African members compliance ratings against the exchange of information on request standard**

African member	Round 1 rating	Round 2 rating
Algeria	Not reviewed	Launch scheduled for Q4 2024
Angola	Not reviewed	Launch scheduled for Q1 2026
Benin	Not reviewed	Launch scheduled for Q4 2024
Botswana	Largely Compliant	Largely Compliant
Burkina Faso	Largely Compliant	Ongoing (Phase 1 launched Q4 2023)***
Cabo Verde	Not reviewed	Launch scheduled for Q3 2024
Cameroon	Largely Compliant	Largely Compliant
Chad	Not reviewed	Launch scheduled for Q1 2026
Congo (Republic of the)	Not reviewed	Launch scheduled for Q4 2025
Côte d'Ivoire	Not reviewed	Ongoing (Phase 2 launched Q4 2023)***
Congo (Dem. Rep. of the)	Not reviewed	Launch scheduled for Q4 2026
Djibouti	Not reviewed	Ongoing (Phase 1 launched Q3 2023)****
Egypt	Not reviewed	Partially Compliant
Eswatini	Not reviewed	Phase 1 scheduled for Q2 2024
Gabon	Largely Compliant	Phase 1 only (Phase 2 scheduled for Q1 2025)***
Ghana	Largely Compliant	Partially Compliant
Guinea	Not reviewed	Launch scheduled for Q3 2024
Kenya	Largely Compliant	Largely Compliant
Lesotho	Largely Compliant	Phase 1 only (Phase 2 scheduled for Q2 2026)*****
Liberia	No rating (Only Phase 1 review)	Partially Compliant
Madagascar	Not reviewed	Ongoing (Phase 1 launched in Q4 2023)****
Mali	Not reviewed	Launch scheduled for Q1 2026
Mauritania	Largely Compliant	Phase 1 only (Phase 2 scheduled for Q4 2026)*****
Mauritius	Largely Compliant	Compliant
Morocco	Largely Compliant	Largely Compliant
Namibia	Not reviewed	Launch scheduled for Q3 2024
Niger	Not reviewed	Launch scheduled for Q3 2026
Nigeria	Largely Compliant	Largely Compliant
Rwanda	Not reviewed	Ongoing (Phase 1 launched in Q4 2023)****
Senegal	Largely Compliant	Ongoing (Launched in Q3 2023)
Seychelles	Largely Compliant	Partially Compliant (Supplementary Review scheduled for Q1 2025)
Sierra Leone	Not reviewed	Launch scheduled for Q2 2026
South Africa	Compliant	Largely Compliant
Tanzania	Not reviewed	Phase 1 only (Phase 2 scheduled for Q3 2025)****
Togo	Not reviewed	Phase 1 only (Phase 2 scheduled for Q2 2026)****
Tunisia	No rating (Only Phase 1 review)	Largely Compliant
Uganda	Largely Compliant	Ongoing (Launched in Q2 2023)
Zambia**	Not reviewed	Launch scheduled for Q1 2027
Zimbabwe	Not reviewed	Launch scheduled for Q2 2026

Note:
* The four possible ratings allocated after a full peer review are as follows, ranked in increasing quality: Non–Compliant, Partially Compliant, Largely Compliant, Compliant.
** Became a Global Forum and Africa Initiative member in 2024. *** Subject to a Phase 1 review due to the COVID–19 pandemic. **** Subject to a phased review due to limited or no experience in EOIR.

Source: EOIR, Schedule of Round 2 Reviews, 2016 -2027, https://www.oecd.org/tax/transparency/documents/schedule-of-reviews.pdf and Global Forum, EOIR Peer Reviews Compliance Ratings, https://www.oecd.org/tax/transparency/documents/exchange-of-information-on-request-ratings.htm.

(Phase 1 review) as no onsite visit could be undertaken due to the COVID–19 pandemic (Côte d'Ivoire and Gabon) or due to limited or no experience in EOIR (Lesotho, Mauritania, Tanzania and Togo).

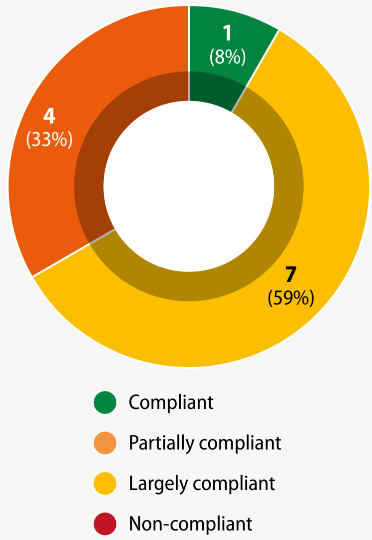
- 19 African members are yet to be subjected to either a full review or a Phase 1 review during the Round 2 reviews.

The results of the 12 African countries subjected to a full review in the Round 2 reviews indicate that:

- 67% of African countries obtained a satisfactory overall rating of "Compliant" or "Largely Compliant" and 33% obtained a non–satisfactory overall rating of "Partially Compliant". No African country was rated overall "Non–Compliant".
- Only one African country (Mauritius) is rated overall "Compliant", while seven are rated "Largely Compliant" (Botswana, Cameroon, Kenya, Morocco, Nigeria, South Africa and Tunisia). The remaining four countries obtained an overall rating of "Partially Compliant" (Egypt, Ghana, Liberia and Seychelles).
- Compared to the Round 1 reviews, one country improved its overall rating from "Largely Compliant" to "Compliant" (Mauritius), one had its overall rating downgraded from "Compliant" to "Largely Compliant" (South Africa), five maintained a "Largely Compliant" overall rating (Botswana, Cameroon, Kenya, Morocco and Nigeria) and two had their overall ratings downgraded from "Largely Compliant" to "Partially Compliant" (Ghana and Seychelles).
- Of the three countries reviewed or rated for the first time in the Round 2 reviews, one attained an overall rating of "Largely Compliant" (Tunisia) and two are rated overall "Partially Compliant" (Egypt, Liberia).

As observed in the 2023 TTiA report, the downgrades in the overall ratings of African members continue to be mainly attributed to gaps in meeting the enhanced requirements in the 2016 ToR for ensuring the availability of beneficial ownership information for legal persons and arrangements (Element A.1) and of bank accounts (Element A.3) and gaps in requesting and providing information in a timely manner (Element C.5). The Global Forum Secretariat is supporting the African countries who obtained an overall rating of "Partially Compliant" to address the identified gaps, including improving the beneficial ownership transparency frameworks, with a view to obtaining a supplementary review when sufficient progress has been made.

FIGURE 10. **Ratings obtained by African countries in the Round 2 EOIR peer reviews**



Note: This figure is based on the ratings achieved by 12 African countries fully reviewed in Round 2 of the EOIR peer reviews.

Source: Global Forum, EOIR Peer Reviews Compliance Ratings, https://www.oecd.org/tax/transparency/documents/exchange–of–information–on–request–ratings.htm.

Beneficial ownership transparency in African countries

Since 2016, the EOIR standard requires every jurisdiction to ensure the availability of adequate, accurate and up–to–date information on both the legal owners and beneficial owners of relevant legal entities and arrangements (Element A.1) and bank accounts (Element A.3) and to ensure that tax authorities are able to obtain this information. Table 10 provides a summary of determinations and ratings received by African countries on Element A.1 and A.3 in the Round 2 EOIR reviews.

While Element A.1 also requires the availability of legal ownership information of legal entities and arrangements, most of the deficiencies identified in Round 2 relate to the availability of beneficial ownership information of legal entities and arrangements. Figure 11 shows the results of the determinations and compliance ratings obtained by African countries.

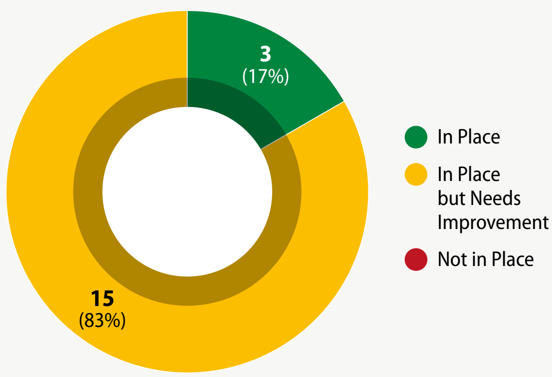
Global Forum Secretariat supports Rwanda in the implementation of the tax transparency standards, 31 July–5 August 2023, Kigali, Rwanda

- The legal framework to ensure the availability of beneficial ownership information was found in general in place with some improvements needed for all assessed African countries with the exception of Ghana, Togo and Tunisia for which no deficiencies were found. The main deficiencies identified include beneficial ownership definitions that are not in line with the standard, the absence of legal provisions for ensuring the information is up to date and lack of adequate guidance on the identification of beneficial owners of legal entities and arrangements.
- Challenges in the practical implementation of the legal framework have been identified for all African countries that have been fully assessed. This is mainly due to nascent, inadequate or insufficient oversight by supervisory authorities to enforce the legal requirements.
- No African country is rated "Compliant" with Element A.1, five are rated "Largely Compliant" (Botswana, Cameroon, Mauritius, Morocco and Tunisia), and seven are rated "Partially Compliant" (Egypt, Ghana, Kenya, Liberia, Nigeria, Seychelles and South Africa), while the remaining six are not rated because their practical implementation of the legal framework is yet to be assessed.

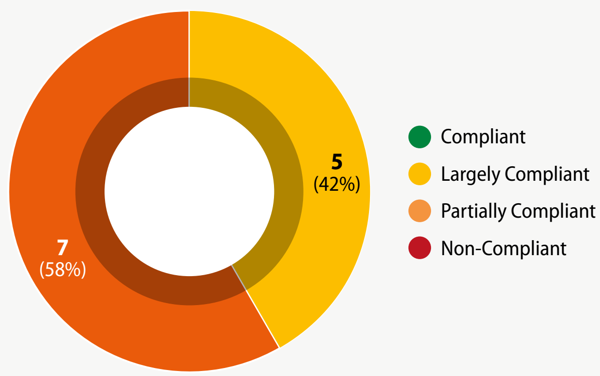
With respect Element A.3, of the 12 African countries that have been subject to a full review, two are "Compliant" (Ghana and Mauritius) and the remaining 10 are "Largely Compliant", indicating the level of maturity

FIGURE 11. **Element A.1 determinations and compliance ratings of African countries in Round 2 EOIR peer reviews**

Element A.1 determinations achieved by 18 African countries in Round 2 reviews



Element A.1 ratings achieved by12 African countries subject to a full review in Round 2



Note: The figure on the left side is based on the determinations on the legal and regulatory framework achieved by 18 African countries in the Round 2 EOIR peer reviews. The figure on the right-hand side is based on the rating issued to the 12 African countries that have not been fully reviewed in Round 2 EOIR peer reviews.

Source: EOIR peer review reports published since 2010 – https://www.oecd-ilibrary.org/taxation/global-forum-on-transparency-and-exchange-of-information-for-tax-purposes-peer-reviews_2219469x.

TABLE 10. **Determinations and ratings of African members on the availability of beneficial ownership information (Element A.1 and Element A.3)**

African member country	Element A.1 – beneficial ownership information for all legal entities and arrangements		Element A.3 – beneficial ownership information on bank accounts	
	Legal framework determination	Practical implementation rating	Legal framework determination	Practical implementation rating
Botswana	In Place but Needs Improvement	Largely Complaint	In Place	Largely Complaint
Cameroon	In Place but Needs Improvement	Largely Complaint	In Place but Needs Improvement	Largely Complaint
Côte d'Ivoire	In Place but Needs Improvement	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Egypt	In Place but Needs Improvement	Partially Complaint	In Place but Needs Improvement	Largely Compliant
Gabon	In Place but Needs Improvement	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Ghana	In Place	Partially Compliant	In Place	Compliant
Kenya	In Place but Needs Improvement	Partially Compliant	In Place but Needs Improvement	Largely Compliant
Lesotho	In Place but Needs Improvement	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Liberia	In Place but Needs Improvement	Partially Compliant	In Place but Needs Improvement	Largely Compliant
Mauritius	In Place but Needs Improvement	Largely Compliant	In Place	Compliant
Mauritania	In Place but Needs Improvement	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Morocco	In Place but Needs Improvement	Largely Compliant	In Place but Needs Improvement	Largely Compliant
Nigeria	In Place but Needs Improvement	Partially Compliant	In Place but Needs Improvement	Largely Compliant
Seychelles	In Place but Needs Improvement	Partially Compliant	In Place but Needs Improvement	Largely Compliant
South Africa	In Place but Needs Improvement	Partially Compliant	In Place but Needs Improvement	Largely Compliant
Tanzania	In Place but Needs Improvement	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Togo	In Place	Not yet reviewed	In Place but Needs Improvement	Not yet reviewed
Tunisia	In Place	Largely Compliant	In Place	Largely Compliant

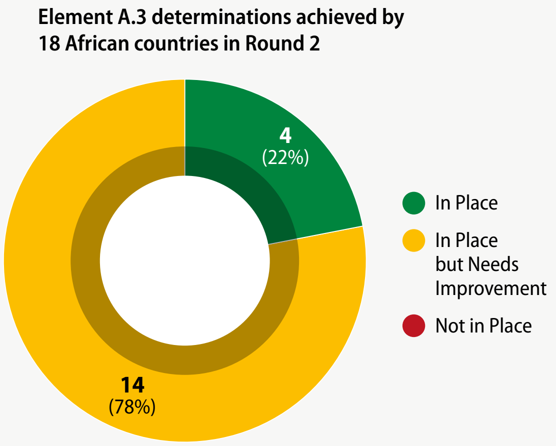
Note: This table only takes into account both the 12 African countries which have been fully reviewed by the Global Forum in the Round 2 EOIR peer reviews and the 6 African countries that have only undergone a Phase 1 review in the Round 2 EOIR peer reviews.

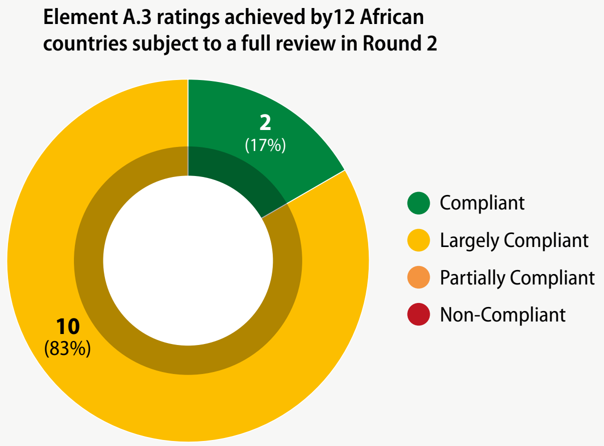
* Determinations are issued following an assessment of the legal and regulatory framework. The structure of the determinations is as follows, ranked in decreasing quality: In Place, In Place But Needs Improvement and Not In Place.

** Ratings are issued following an assessment of the practical implementation of the legal and regulatory framework. The structure of the ratings is as follows, in decreasing quality: Compliant, Largely Compliant, Partially Compliant and Non–Compliant.

Source: Global Forum, EOIR peer reviews, https://www.oecd.org/tax/transparency/documents/exchange–of–information–on–request–ratings.htm.

FIGURE 12. **Element A.3 – Determinations and compliance ratings of African countries in Round 2 EOIR peer reviews**





Note: The figure on the left side is based on the determinations on the legal and regulatory framework achieved by 18 African countries in the Round 2 EOIR peer reviews. The figure on the right–hand side is based on the rating issued to the 12 African countries that have neem fully reviewed in Round 2 EOIR peer reviews.

Source: EOIR peer review reports published since 2010 – https://www.oecd–ilibrary.org/taxation/global–forum–on–transparency–and–exchange–of–information–for–tax–purposes–peer–reviews_2219469x.

on this element. The legal frameworks for ensuring the availability of banking information, including beneficial ownership, is "In Place" in four countries (Botswana, Ghana, Mauritius and Tunisia) and "In Place but Needs Improvement" in the remaining 14. The main deficiencies identified in the legal framework relates to ensuring that beneficial ownership information on bank accounts is up to date. All the six African countries that have only undergone a Phase 1 review have a legal and regulatory framework that is "In Place but Needs Improvement". Figure 12 shows the results of the determinations and compliance ratings for Element A.3 by African countries in the Round 2 EOIR peer reviews.

While the EOIR standard requires that jurisdictions have in place a framework that ensures the availability of beneficial ownership information, it is not prescriptive on the path to guarantee the availability of this information. Countries usually use one or more of the following four main policy approaches:

- **Anti–money laundering and counter–financing of terrorism (AML/CFT) approach**: relying on information already collected by persons subject to AML/CFT legislation and its related customer due diligence or know your customer obligations.
- **Entity approach**: requiring the legal persons and legal arrangements (such as companies, partnerships and trusts) to identify their beneficial owners and maintain their own records of accurate and up-to-date information on their beneficial owners.
- **Central register approach**: an extension of the entity approach which requires all legal persons and arrangements to identify their beneficial owners and to provide that information to a central register supervised by a designated authority. The information should be filed with the register upon creation, periodically and every time there is a change.
- **Tax authority approach**: an extension of the entity approach that requires legal persons and arrangements to identify their beneficial owners and to provide that information to the tax authority.

The vast majority of the countries who have been reviewed in the Round 2 EOIR peer reviews used at the time of their review two or more of these approaches to ensure beneficial ownership transparency (see Table 11). All the 18 African countries assessed use the AML/CFT approach, which is usually the main source of beneficial ownership information on bank accounts under Element A.3 and a partial source of

Women Leaders in Tax Transparency network reception, 30 November 2023, Lisbon, Portugal.

beneficial ownership information under Element A.1. With the exception of three countries, they also use the entity approach (12 countries) and the central register approach (9 countries). Only three countries use the tax authority approach. Since their reviews, a number of countries have continued to improve their beneficial ownership transparency frameworks by strengthening existing approaches and adopting additional approaches including by establishing a central register of beneficial owners to complement the approaches in place at the time of their reviews.

The lessons learned from the Round 2 EOIR peer reviews indicate that the combination of various approaches (multi–pronged approach) may lead to a more robust beneficial ownership framework. However, it does not automatically lead to more efficient beneficial ownership systems if the different approaches are not aligned with the requirements of the standard and are not effectively enforced with strong monitoring and supervision (see Table 11). In addition to the potential benefits of ensuring a greater level of beneficial ownership transparency and obtaining a better rating in the Global Forum peer reviews, adopting a multi–pronged approach also enables the country to meet the requirements of other international standards. Indeed, in March 2022 the Financial Action Task Force (FATF) adopted a stronger global beneficial ownership standard regarding legal persons by revising Recommendation 24 on legal persons and its Interpretative Notes. An explicit requirement for countries to use a multi–pronged approach was included.[12] In February 2023, the FATF adopted amendments to Recommendation 25 on legal arrangements to bring its requirements broadly in line with those for Recommendation 24 to ensure a balanced and coherent set of FATF standards on beneficial ownership.[13]

To assist West African countries to improve their beneficial ownership transparency frameworks, the Global Forum Secretariat, under the Fiscal Transition Support Programme in West Africa (PATF), supported by the European Union, has assisted ECOWAS member states to develop and adopt a directive harmonising the rules on beneficial ownership in the region.[14]

To assist member jurisdictions to develop effective beneficial ownership transparency frameworks, the Global Forum Secretariat has developed model legislation for beneficial ownership, which is available on demand,[15] and released a toolkit for building effective beneficial ownership frameworks.[16] Training and bespoke technical assistance is also provided to African countries to improve their beneficial ownership transparency frameworks to meet the requirements of the international standards.

12. Additional information can be found at FATF (2023), *Guidance on Beneficial Ownership for Legal Persons*, FATF, Paris, https://www.fatf–gafi.org/content/fatf–gafi/en/publications/Fatfrecommendations/Guidance–Beneficial–Ownership–Legal–Persons.html and Box 9 in OECD (2023), *Tax Transparency in Africa 2023: Africa Initiative Progress Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/tax–transparency–in–africa–2023.pdf.

13. For more information see FATF (2012–2023), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, https//www.fatf–gafi.org/en/publications/Fatfrecommendations/Fatf–recommendations.html.

14. Directive C.DIR.2/07/23 on the harmonisation of Rules on Beneficial Ownership of Legal Entities within ECOWAS Member States. The ECOWAS Member States have until 1 January 2027 to transpose the requirements of the Directive into legislation.

15. More information on the model beneficial ownership legislations is available on demand from the Global Forum Secretariat.

16. https://www.oecd.org/tax/transparency/documents/effective-beneficial-ownership-frameworks-toolkit-second-edition.pdf (to be launched in June 2024).

TABLE 11. **Approaches adopted by African countries to ensure availability of beneficial ownership information for Element A.1**

Country	Approach				No of approaches	Element A.1	
	AML/ CFT	Entity	Central Register	Tax authority		Legal determination	Rating
Botswana	●	●	●		3	In Place but Needs Improvement	Largely Compliant
Cameroon	●	●		●	3	In Place but Needs Improvement	Largely Compliant
Côte d'Ivoire	●	●			2	In Place but Needs Improvement	–
Egypt	●	●	●		3	In Place but Needs Improvement	Partially Compliant
Gabon	●				1	In Place but Needs Improvement	–
Ghana	●				1	In Place	Partially Compliant
Kenya	●	●	●		3	In Place but Needs Improvement	Partially Compliant
Lesotho	●	●			2	In Place but Needs Improvement	–
Liberia	●	●			2	In Place but Needs Improvement	Partially Compliant
Mauritania	●		●		2	In Place but Needs Improvement	–
Mauritius	●				1	In Place but Needs Improvement	Largely Compliant
Morocco	●	●		●	3	In Place but Needs Improvement	Largely Compliant
Nigeria	●		●		2	In Place but Needs Improvement	Partially Compliant
Seychelles	●	●	●		3	In Place but Needs Improvement	Partially Compliant
South Africa	●	●			2	In Place but Needs Improvement	Partially Compliant
Tanzania	●		●		2	In Place but Needs Improvement	–
Togo	●	●	●	●	4	In Place	–
Tunisia	●	●	●		3	In Place	Largely Compliant

Note: This table is based on the legal determinations and ratings issued to 18 African countries that have been assessed in Round 2 EOIR peer reviews. Please note that a number of jurisdictions have further enhanced their beneficial ownership transparency frameworks by strengthening existing approaches or adopting additional approaches in their legal framework.

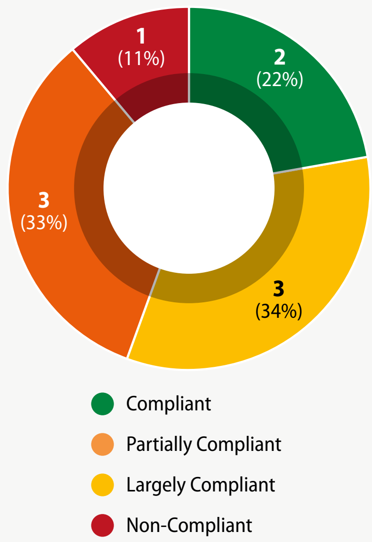
Source: Analysis by the Global Forum Secretariat based on published EOIR Peer Review Reports available at https://www.oecd-ilibrary.org/taxation/global-forum-on-transparency-and-exchange-of-information-for-tax-purposes-peer-reviews_2219469x

Impact of improvements in organisational processes for managing exchange of information

The results of 12 African countries[17] that have undergone a full review in the Round 2 EOIR peer review indicate that African countries are facing challenges with the quality and timelines of responses (Element C.5) (see Figure 13). Only seven countries (58%) obtained a satisfactory rating on element C.5, with two rated "Compliant" (Mauritius and Nigeria) and five rated "Largely Compliant" (Botswana, Kenya, Liberia, Tunisia and South Africa). The remaining five (42%) did not obtain a satisfactory rating with three rated "Partially Compliant" (Cameroon, Morocco and Seychelles) and two rated as "Non–Compliant" (Egypt and Ghana).

The key deficiencies identified include delay in providing responses to requests, failure to provide status updates, inadequate staffing given the level of EOI activity and poor communication channels with treaty partners leading to mishandling of requests and non–receipt of requests. This emphasises the importance of adequately resourcing the EOI functions and actively using appropriate tools to monitor the handling of requests received. It also underscores the importance of communication with other foreign CAs so that EOI requests are directed to the appropriate offices, which helps preserve the confidentiality of the information contained in the requests.

FIGURE 13. **Quality and timeliness of responses to requests for information (Element C.5): Distribution of ratings for 12 African countries**



Note: This figure is based on the ratings achieved by 12 African countries fully reviewed in Round 2 of the EOIR peer reviews.

Source: Global Forum, EOIR Peer Reviews Compliance Ratings, https://www.oecd.org/tax/transparency/documents/exchange–of–information–on–request–ratings.htm.

17. No rating for Element C.5 was assigned to the remaining six countries (Côte d'Ivoire, Gabon, Lesotho, Mauritania, Tanzania and Togo) as they have only been subjected to a Phase 1 review which does not involve issues of practice that are only dealt with in the Phase 2 review.

14th meeting of the Africa Initiative, 28 November 2023, Lisbon, Portugal.

IMPLEMENTATION OF THE STANDARD OF AUTOMATIC EXCHANGE OF FINANCIAL ACCOUNT INFORMATION

AEOI helps jurisdiction to identify significant additional revenues. The use of AEOI data enables authorities to detect previously undeclared foreign source income and therefore identify the related revenues. AEOI also has a powerful deterrence effect on taxpayers. VDPs initiated in the context of the implementation of automatic exchanges, bring additional revenues and enable the expansion of the tax base, with new taxpayers previously not taxed.

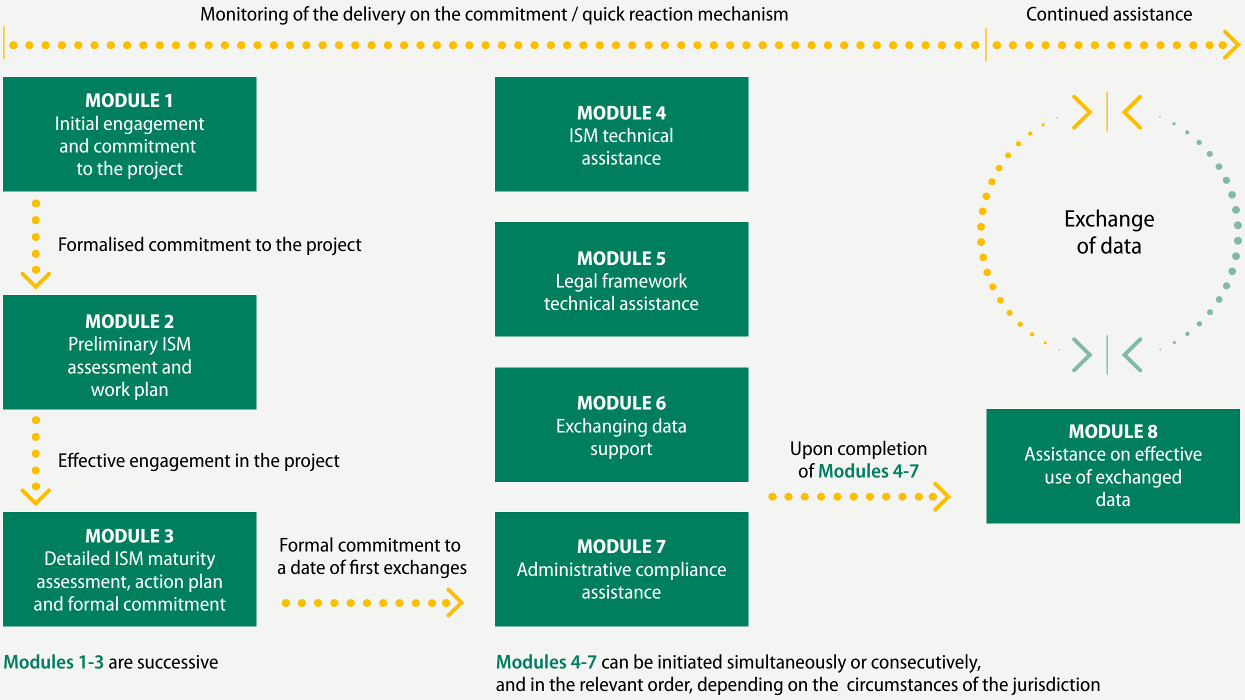
The first automatic exchanges of financial accounts information occurred in 2017 and 2018. Developing countries that do not host a financial center were not required to start AEOI by a defined date. However, like all members of the Global Forum, they are committed to implement the AEOI standard, albeit with a practical timeline, to be defined with the support of the Global Forum Secretariat. After a Plan of Action for Developing Countries Participation in AEOI launched in 2017,[18] the

BOX 12. **Implementation strategy for automatic exchange of financial account information**

The Strategy is based on a modular approach that divides technical assistance programmes into several coherent and logical modules with specific targets to be achieved in order to move from one module to another. In line with the Global Forum's broader 2020 Capacity–Building Strategy, the modular approach is implemented to ensure a better allocation of resources and improved monitoring.

While modules 1 to 3 take place successively, modules 4 to 7 can be initiated simultaneously or consecutively, and in the relevant order, based on the particular circumstances of the jurisdiction. As for module 8 on assistance on effective use of exchanged data, it is considered a continued assistance.

Modular approach for the AEOI implementation



Source: OECD (2021), *Unleashing the potential of automatic exchange of information for developing countries*, https://www.oecd.org/tax/transparency/documents/aeoi–strategy–developing–countries.pdf.

18. OECD (2017), *The Global Forum's Plan of Action for Developing Countries Participation in AEOI*, https://www.oecd.org/tax/transparency/plan–of–action–AEOI–and–developing–countries.pdf

TABLE 12. **Status of African countries' participation in automatic exchange of financial account information**

2017	2018	2019	2020	2023	2024 (Expected)	2025 (Expected)	2026 (Expected)
Seychelles South Africa	**Mauritius** Seychelles South Africa	**Ghana** Mauritius Seychelles South Africa	Ghana Mauritius **Nigeria** Seychelles South Africa	Ghana Mauritius Nigeria Seychelles South Africa	Ghana **Kenya** Mauritius Nigeria Seychelles South Africa Uganda	Ghana Kenya Mauritius **Morocco** Nigeria **Rwanda** **Senegal*** Seychelles South Africa **Tunisia** **Uganda**	**Cameroon*** Ghana Kenya Mauritius Morocco Nigeria Rwanda Senegal Seychelles South Africa Tunisia Uganda

Note: Senegal and Cameroon committed in 2024 to first automatic exchanges under the AEOI standard by 2025 and 2026 respectively.

Source: Global Forum, Automatic Exchange of Information (AEOI): Status of Commitments https://www.oecd.org/tax/transparency/AEOI-commitments.pdf.

Global Forum Secretariat put in place in 2021 a strategy for providing technical assistance to all members, with a focus on developing countries (see Box 12).[19] Overall, the implementation of this strategy is bearing fruits where there is a strong commitment at political and technical levels.[20] Excluding the five African jurisdictions that are already exchanging AEOI data, five out of the seven African countries committed to implementing AEOI by a specific date, made their commitment after the Strategy was proposed in 2021.

Increasing participation of Africa in automatic exchange of financial account information

The increase in the number of African countries implementing or committed to implementing AEOI by a specific date is a positive result. Only two African countries took part in the first automatic exchanges in 2017. Currently, five African countries are exchanging information automatically and on a reciprocal basis and seven more are committed to undertake first exchanges by 2026 (see Table 12).

While the uptake of AEOI has been increasing on the continent, most African country members have not yet defined a date for their first automatic exchanges. This slow uptake is attributed to a variety of challenges (see Figure 14). These include lack of political commitment, lack of requisite domestic and international legal framework and lack of capacity or resources.

Technical support is provided to African countries to address these challenges (for example see Box 13). It led to more African countries committing to first exchanges by a specific date (see Table 12), with the seven African countries that are committed to undertake their first exchanges by 2026 having mostly put in place the building blocks essential for participation in AEOI (see Figure 15).

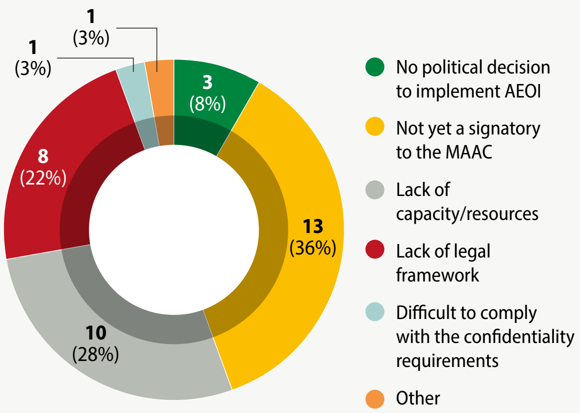
The technical assistance provided to countries implementing, committed to implementing or contemplating commitment to implementing the AEOI standard on a practical timeframe include:

- consultations with key decision makers, including the ministers of finance, to raise awareness on the potential of AEOI
- preliminary assessment of the maturity of the ISM frameworks to help countries determine a practical timeframe for first exchanges

19. OECD (2021), *Unleashing the potential of automatic exchange of information for developing countries* (2021 Strategy), https://www.oecd.org/tax/transparency/documents/aeoi-strategy-developing-countries.pdf.

20. OECD (2023), *Update on the implementation of the 2021 Strategy on Unleashing the Potential of Automatic Exchange of Information for Developing Countries*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/update-on-implementation-of-2021-aeoi-strategy-for-developing-countries.pdf.

FIGURE 14. **Main challenges for African countries not implementing the standard for automatic exchange of financial account information**

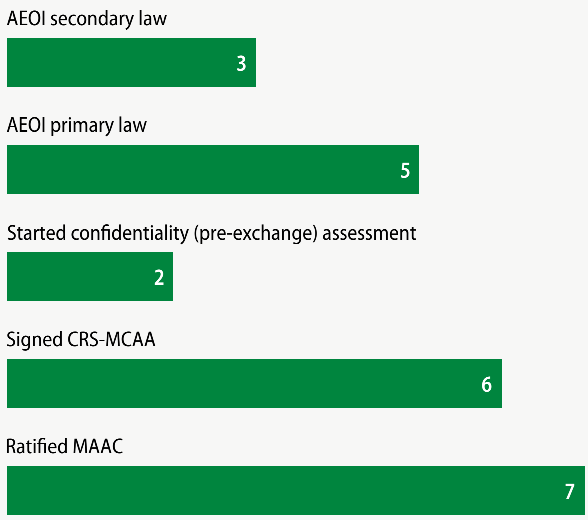


Note: This figure is based on the response of 41 African countries that responded to Tax Transparency in Africa Survey 2024.

Source: Tax Transparency in Africa Survey 2024.

- drafting or improvement of the domestic legal frameworks for AEOI
- establishment of international legal gateway for AEOI by joining the MAAC, signing and activating the CRS Multilateral Competent Authority Agreement (CRS–MCAA)[21] to exchange information with all interested and appropriate partners (jurisdictions interested in receiving information and that meet the required standards in relation to CDS)
- guidance in developing the AEOI portal and enrollment into the Common Transmission System (CTS)[22]
- formulation and implementation of a strategy to ensure financial institutions comply with the due diligence and reporting obligations
- making effective use of CRS data received.

FIGURE 15. **Progress made by African countries that have not yet exchanged but are committed to the automatic exchange of financial account information by 2026**



Note: This figure is based on the response of seven African countries that are committed to first automatic exchange under the AEOI standard by 2026.

Source: Tax Transparency in Africa Survey 2024.

First meeting of the Train the Trainer network, 5-6 December 2023, Paris, France.

21. The CRS–MCAA has been developed to facilitate the large–scale implementation of the AEOI standard. A particular bilateral relationship under the CRS–MCAA becomes effective only if both jurisdictions have the MAAC in effect, have filed the required notifications under Section 7 and have listed each other as exchange partner. The text of the CRS–MCAA is available in English and French at https://www.oecd.org/tax/automatic–exchange/international–framework–for–the–crs/multilateral–competent–authority–agreement.pdf.

22. The CTS facilitates the secure exchange of tax information amongst tax authorities. At present, 115 tax authorities are using the CTS for transmissions of CRS data and other 24 types of tax information. Several tax administrations are already using the CTS to exchange other types of tax information, such as EOIR. The guidance on developing the AEOI Portal and enrolment into the CTS is available on demand.

BOX 13. **CAMEROON – Getting equipped to implement the AEOI standard**

Cameroon joined the Global Forum in 2012 and has been working closely with the Secretariat to implement and use EOIR. As it continues to enhance the use of EOIR, Cameroon is now considering the implementation of AEOI.*

Cameroon wishes to commit to implementing AEOI by a specific date, which will be determined shortly. What are the reasons behind Cameroon's decision?

Cameroon, like the other member jurisdictions of the Global Forum, is confronted with the problem of international tax evasion and avoidance, which has a significant impact on our country's tax revenues. In 2016, leaks of data from a foreign bank revealed that 20 Cameroonian residents had accounts worth EUR 23 million. The fact that these accounts were located abroad limited our tax authorities' ability to investigate, which meant there was a risk of losing tax revenue.

According to a report by the International Monetary Fund published in 2019, large deposits i.e. around EUR 4.5 billion (FCFA 3 000 billion) are made in foreign banks by residents of the Economic and Monetary Community of Central Africa *(Communauté économique et monétaire de l'Afrique centrale,* CEMAC), including Cameroon. In terms of tax losses, assuming that the above–mentioned funds are invested in low–yield financial products, with an average income of 2%, the taxable income for tax authorities in the CEMAC region would be around EUR 91.4 million (FCFA 60 billion) per year. In the absence of spontaneous declaration of such income by taxpayers, the tax authorities have no way of knowing of its existence.

However, according to Cameroonian tax legislation, when income from financial assets is received abroad by a person whose domicile, habitual residence or registered office is in Cameroon, that person must declare the income on his or her annual tax return and pay the corresponding tax in Cameroon. Nevertheless, most of Cameroonian taxpayers do not declare their foreign–source income from financial assets, and the tax administration has no way of automatically finding out about this income, so it is unable to claim the tax due.

Conscious of the importance of tackling this issue in order to maximise revenues, Cameroon signed the *Yaoundé Declaration* at the plenary meeting of the Global Forum, which it had the honour of hosting in 2017. By subscribing to this declaration, the Cameroonian authorities have clearly demonstrated their desire to focus on international cooperation in order to combat international tax evasion and avoidance more effectively. This commitment has been in evidence since 2012, when Cameroon joined the Global Forum, and ratified the MAAC in 2015. My country's commitment to AEOI is part of this drive to step up the fight against international tax evasion and avoidance.

What does Cameroon hope to gain from AEOI as part of the mobilisation of public resources?

The implementation of AEOI offers my country a tremendous opportunity to broaden the tax base insofar as this instrument of international cooperation makes it possible to improve access to information for tax purposes and to increase the level of transparency and tax compliance, for both individuals and multinational companies.

As far as companies are concerned, it should be noted that the Large Taxpayers Office in Cameroon, which alone mobilises around 80% of tax revenues in Cameroon, has more than 170 multinationals in its portfolio.
As for individuals, their contribution to overall tax revenues remains very marginal.

Thanks to AEOI, Cameroon's tax administration will not only be able to access tax data needed to broaden the tax base for individuals, in particular by identifying individuals with foreign source income who are not taxed, but will also be able to meet the information needs of audit activities (on–site audits and desk audits) and improve the productivity of tax audits.

What measures has Cameroon already taken as part of this project to implement AEOI, what are the next steps and how could the Secretariat help you?

With a view to joining the AEOI standard, Cameroon requested technical assistance from the Global Forum in 2023 in order to identify the prerequisites to be put in place. I would like to take this opportunity to express the Cameroon Tax Administration's deep gratitude to the Global Forum, which responded favourably to our request and immediately deployed its teams. In line with the recommendations of this technical assistance mission, action has been taken on the three pillars of the AEOI standard.

Firstly, in terms of legislation, the Finance Act for the 2024 financial year has served to pass the domestic legal framework for the standard, in particular the obligations to identify the holders of financial accounts and their tax residence, and to collect and report the relevant information to the tax authorities. Then, at the technical level, in November 2023, with the assistance of the Global Forum Secretariat's capacity-building team, we undertook a pre–assessment of the confidentiality framework, enabling Cameroon to take stock of the situation and measure the prerequisites in terms of information security management for the implementation of AEOI. The work is ongoing.

Finally, on the organisational front, and in the interests of efficiency, we have set up a working group to oversee the entire process of bringing Cameroon in line with the AEOI standard.

With these foundations in place, we need to continue building the system as a whole. We are therefore continuing to work on the following perspectives:

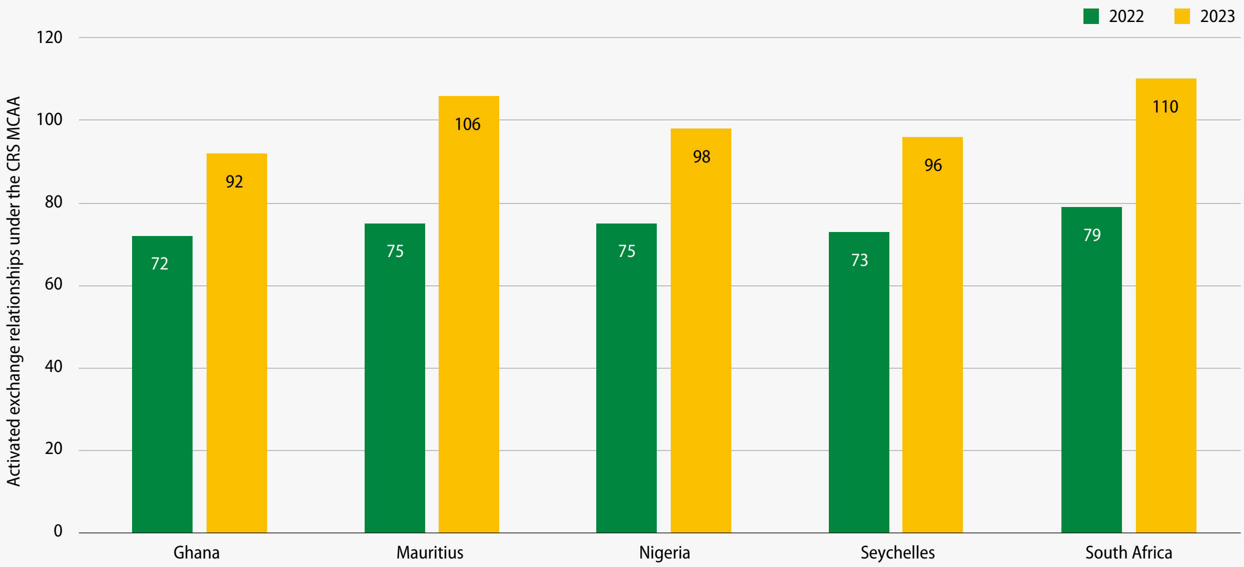
- the determination and notification to the Secretariat of Cameroon's official commitment to implement AEOI and the date of its first exchanges
- the drafting of implementing regulations for the legal provisions enshrining AEOI in order to specify the practical implementation procedures for this standard
- the signing of the CRS Multilateral Competent Authority Agreement
- the development of the IT solution to receive the information returns from reporting financial institutions
- the alignment of our confidentiality and data protection system with the requirements of the standard.

Cameroon's tax administration intends to continue to receive technical assistance from the Global Forum Secretariat to ensure that this important reform is carried out properly. In this respect, a work plan has already been adopted and together we are going to scrupulously follow this roadmap which will lead us, we hope, to the effective launch of AEOI within a relatively short timeframe to be announced very soon.

*__Note__: This interview was done in 2023. In February 2024, Cameroon committed to automatic exchange of financial account information by September 2026.

Source: Roger Athanase Meyong Abath, Director General, Directorate General of Taxes, Ministry of Finance, Cameroon in OECD (2023), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

FIGURE 16. **Number of activated automatic exchange relationships by African countries**



Note: As of March 2024, the total number of CRS–MCAA signatories is 120.

Source: Automatic Exchanges Portal – https://www.oecd.org/tax/automatic-exchange/international-framework-for-the-crs/exchange-relationships/.

Broad network of exchange partners

To receive as much information as possible on its residents with offshore financial accounts, a country needs a broad network of exchange partners. All the five African countries that exchange information automatically have a broad network of exchange partners, with a total of 502 AEOI relationships activated under the CRS–MCAA as at the end of 2023 (see Figure 16). It is expected that this figure will further increase, with other countries in the region due to start exchanging CRS data in the coming years (see Table 12).

Outcome of the peer reviews on automatic exchange of financial account information for African countries

All AEOI–implementing jurisdictions are committed to be monitored and peer reviewed by the Global Forum to ensure the effective implementation of the AEOI standard. The peer review takes place on a staged basis and assesses the legal and regulatory frameworks for AEOI and the effectiveness of their implementation in practice. Table 13 shows the results of the AEOI reviews of the legal and regulatory frameworks and the initial review of effectiveness in practice of AEOI in African countries.

All five African countries that already exchange CRS data were considered to have an international legal framework that meets the standard ("In Place"). However, gaps were identified in the domestic legal framework of three African countries which led to an overall determination of "In Place But Needs Improvement". The main gaps identified in the domestic legal framework include: (a) the absence of rules to prevent Financial Institutions, persons and intermediaries from adopting practices intended to circumvent the reporting and due diligence procedures; (b) absence of obligations on Financial Institutions to maintain records for at least five years from the deadline to report the information; (c) inadequate measures for obtaining valid self–certifications; and (d) inadequate sanctions on account holders and Controlling Persons for failure to provide self–certifications. The Global Forum Secretariat is supporting these countries to amend their legal frameworks to address the identified gaps.

Four of the five African countries which underwent an AEOI effectiveness review posted different results with one "On Track", two "Partially Compliant" and one "Non–Compliant". The main gap identified in the effectiveness reviews relates to having in place an administrative compliance framework to ensure the effective implementation of the due diligence and reporting obligations by Reporting Financial Institutions. The Global Forum Secretariat has supported two countries to develop or enhance their administrative compliance framework and two countries are in the process of receiving support.

Box 14 highlights the support provided by the Secretariat to African countries to address the recommendations from the AEOI peer reviews and the positive effect it has had on subsequent reviews.

TABLE 13. **Results of peer reviews on automatic exchange of financial account information in Africa**

Country	Review of AEOI legal frameworks			Initial review of effectiveness in practice of AEOI		
	CR1 Domestic legal framework	CR2 International legal framework	Overall determination	CR1 Domestic information collection and reporting	CR2 International information exchange	Overall rating
Ghana	In Place But Needs Improvement	In Place	In Place But Needs Improvement	Partially Compliant	On Track	Partially Compliant
Mauritius	In Place	In Place	In Place	On track	On track	On track
Nigeria	In Place But Needs Improvement	In Place	In Place But Needs Improvement	Not yet reviewed		
Seychelles	In Place But Needs Improvement	In Place	In Place But Needs Improvement	Non–Compliant	Non–Compliant	Non–Compliant
South Africa	In Place	In Place	In Place	Partially Compliant	On Track	Partially Compliant

Note:
*The structure of the determinations on the legal framework is as follows, ranked in decreasing quality: In Place, In Place But Needs Improvement and Not In Place.
**The structure of the ratings for the first reviews of effective implementation is as follows, in decreasing quality: On Track, Partially Compliant and Non–Compliant.

Source: OECD (2023), *Peer Review of the Automatic Exchange of Financial Account Information 2023 Update*, OECD Publishing, Paris, https://doi.org/10.1787/5c9f58ae–en.

BOX 14. **GHANA – Towards an effective administrative compliance strategy**

Ghana commenced its first exchanges under the AEOI standard in 2019. As all other committed jurisdictions, Ghana's implementation of this standard is subject to a peer review. One of the challenging components for many committed jurisdictions has been the development of a strategy to ensure compliance of Reporting Financial Institutions with their due diligence and reporting obligations and its effective implementation in practice.

What steps did Ghana take to establish an overarching administrative compliance framework to ensure the effective implementation of the AEOI standard? What support did Ghana receive from the Global Forum Secretariat and how did this support help close the gaps identified?

At the end of the first round of AEOI reviews, Ghana was rated as "Non–Compliant" for the effective implementation of the standard in practice as required by Core Requirement One (CR1) of the Terms of Reference for AEOI Peer Reviews. Ghana was also "Partially Compliant" with respect to the AEOI with partner jurisdictions in an effective and timely manner as required by Core Requirement Two (CR2). The overall rating for Ghana was therefore "Non–Compliant" for the effectiveness in practice.

An evaluation of Ghana performance during the first round of AEOI reviews identified the need for the development of an administrative compliance strategy for the effective implementation of the AEOI standard. Through further

Continued on page 72 ...

... Box 14 continued.

engagement with Ghana's technical assistance team at the Global Forum, Ghana understood that technical assistance from the Secretariat was available to enable Ghana to develop a comprehensive administrative compliance framework.

In the context of a bilateral technical assistance programme, Ghana was provided with a model administrative compliance strategy and guidance during a series of bilateral meetings. This led Ghana to develop a draft administrative compliance strategy, suited to the circumstances of Ghana Revenue Authority. This draft was discussed and refined with the assistance of the Secretariat after which it was finalised and adopted by Ghana Revenue Authority to guide the effective implementation of the AEOI standard in Ghana.

What has been the impact of the actions taken by Ghana on its assessment of AEOI effectiveness in practice (from the perspective of the 2023 update to the AEOI Peer Review Report)? What are the next steps in the effective implementation of the administrative compliance strategy and the AEOI standard in Ghana?

In 2023, Ghana's implementation of the AEOI standard in practice was reviewed. As a result of developing, adopting and starting the implementation of the administrative compliance strategy, Ghana's ratings improved to Partially Compliant in respect of CR1 and On–Track for CR2 with an overall rating of Partially Compliant.

The administrative compliance strategy has assisted Ghana Revenue Authority in setting out policies and procedures for ensuring that Reporting Financial Institutions correctly implement due diligence procedures and report as required. Currently outreach programmes are well defined and being pursued systematically to ensure continuous improvement by generating awareness and promoting voluntary compliance with the CRS obligations.

Ghana has also deepened activities in the areas of:

- conducting a risk assessment, in order to plan and programme informed compliance activities
- monitoring issues that could put at jeopardy the integrity of the CRS
- carrying out effective compliance activities and applying enforcement measures as appropriate
- effectively, and in a timely manner, communicating and co–operating with exchange partners
- monitoring the implementation of the strategy, and generating appropriate statistics, for the purposes of improved management decision making.

Going forward stakeholder engagement will be activated to improve their understanding with the expectation to enhance the effective implementation of the CRS in practice. With all these actions, including the finalisation of in–depth audits, Ghana is expecting to improve its compliance with the AEOI standard.

Source: Ghana Revenue Authority in OECD (2023), *Enabling Global Progress in Tax Transparency: 2024 Global Forum Capacity Building Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

14th meeting of the Africa Initiative, 28 November 2023, Lisbon, Portugal.

IMPLEMENTATION OF THE CRYPTO–ASSET REPORTING FRAMEWORK

In response to the rapid development and growth of the crypto–asset market, the international community has sought to ensure that recent gains in global tax transparency brought about by AEOI will not be eroded. In light of the specific features of the crypto–asset markets, the OECD, working with G20 countries, developed the Crypto–Asset Reporting Framework (the CARF), a dedicated global tax transparency framework which provides for the automatic exchange of tax information on transactions in crypto–assets in a standardised manner with the jurisdictions of residence of taxpayers on an annual basis.

The CARF consists of rules and commentary which set out:

- the scope of crypto–assets to be covered
- the entities and individuals subject to data collection and reporting requirements
- the transactions subject to reporting, as well as the information to be reported in respect of such transactions
- the due diligence procedures to identify crypto–asset users and controlling persons, and to determine the relevant tax jurisdictions for reporting and exchange purposes
- an electronic format (XML schema) to be used by Competent Authorities for purposes of exchanging the CARF data, as well as by Reporting Crypto–Asset Service Providers to report CARF data to tax authorities (as required by domestic law).

In October 2022, the G20 called on the Global Forum to take forward work on the CARF's implementation. Reflecting the importance of the CARF to ensuring that recent gains in global tax transparency will not be gradually eroded, a significant number of jurisdictions have announced their intent[23] to work towards swiftly transposing the CARF into domestic law and activating exchange agreements in time for exchanges to commence by 2027 (subject to national legislative procedures as applicable).

Two African countries (Mauritius and South Africa) are part of this group of CARF–committed jurisdictions. African countries are as exposed to crypto assets as other countries. Given that most African countries are yet to implement the AEOI standard, they have the opportunity to onboard both the CRS and the CARF in their domestic legislation at the same time.

23. This commitment is embodied in the Joint Statement on the Implementation of the CARF launched on 10 November 2023. As of end 2023, 56 jurisdictions joined this Statement which is available at https://www.oecd.org/tax/transparency/documents/CARF–signatories–joint–statement.pdf.

CROSS–BORDER ASSISTANCE IN THE RECOVERY OF TAX CLAIMS

Above 68% (28 countries) of the 41 African countries that responded to the survey indicated that they have a legal framework that facilitates participation in CBAR. However, not all these countries are signatories to the MAAC meaning that they have a narrow network of international agreements to facilitate this form of administrative assistance.

Of the 41 African countries that responded to the survey, 2 reported having sent a request for CBAR, while 3 reported receiving a request from other jurisdictions to provide assistance in 2023. In comparison, in 2022, five African countries sent a request, while three received a request. The two African countries sent 10 requests covering a sum of EUR 1.2 million. The three African countries received 31 requests covering EUR 7.2 million.

The African countries that sought assistance reported facing several challenges. These include the lack of an international legal gateway for CBAR or reservations against providing this form of assistance entered by jurisdictions participating in a multilateral framework that provide for CBAR. Some countries reported lacking an enabling domestic legal framework that allows the tax authority to recover tax claims on behalf of a foreign jurisdiction and to remit the recovered taxes.

The African countries that received requests also reported several challenges. These include lacking an enabling international and domestic legal framework to facilitate this form of assistance. They also reported operational challenges, such as no dedicated office and resources to facilitate cooperation with foreign partners and no operational manual to guide on the handling of CBAR requests. The administrative challenges reported include time taken to trace the debtors or their assets and requests which are incomplete or not accompanied with relevant documentation.

The Toolkit for Establishing a Function for Cross–Border Assistance in the Recovery of Tax Claims published by the Global Forum Secretariat in July 2023 provides tax authorities with practical tools for participating in this form of administrative assistance.[24] Under the banner of the Africa Initiative, the Global Forum Secretariat and partners of the Africa Initiative will continue supporting African countries to establish appropriate frameworks necessary for participation in this form of assistance through trainings and tailored technical assistance.

24. OECD (2023), *A Toolkit for Establishing a Function for Cross–Border Assistance in the Recovery of Tax Claims*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris op. cit.

Global Forum/CREDAF/AIST workshop on cross-border assistance in the recovery of tax claims, 10-12 July 2023, Noisy-le-Grand, France.

4

Using tax transparency to enhance domestic resource mobilisation

The tax transparency standards aim at ensuring the effective exchange of information among tax authorities around the world, for the enforcement of their tax laws and to better tackle cross–border tax evasion and enhancing domestic resource mobilisation.

USE OF EXCHANGE OF INFORMATION ON REQUEST BY AFRICAN COUNTRIES

When actively used by tax administrations, EOIR is a powerful tool for deterring and detecting tax evasion and enhancing DRM (see Box 15).

BOX 15. **CAMEROON – Usefulness of exchange of information on request**

Case study 1: Record additional revenue from EOIR

Tax resources account for 60% of the State budget in Cameroon, making them the main source of funding for the development objectives aimed at making Cameroon an emerging country by 2035. However, like a number of developing jurisdictions, Cameroon has to contend with international tax evasion and avoidance, which have a significant impact on tax revenues.

Aware of the importance of international tax cooperation, particularly EOI for tax purposes, in curbing these scourges, Cameroon committed to implementing the international tax transparency standards by joining the Global Forum in 2012. Since then, with the ongoing support of the Global Forum Secretariat, Cameroon has carried out several reforms aimed at making EOI an effective tool for combating international tax evasion and avoidance and increasing tax revenues.

On the legal front, Cameroon has become a party to the MAAC, which came into force in 2015 and allows it to do the EOI with more than 140 jurisdictions in the world, including all international financial centres. Cameroon has also strengthened the framework for transparency and access to information by, among other things, reinforcing the conditions for obtaining banking information, ensuring the availability of information on bearer shares, trusts and other foreign legal arrangements, and beneficial owners of legal persons and arrangements, and by extending the time limit for the tax authorities to correct taxpayers' affairs, in the event an EOI request is sent abroad. On an organisational and administrative level, Cameroon has set up a functional unit for international EOI within the Directorate General of Taxes, with appropriate resources. Emphasis has also been placed on building the capacity of human resources, through an EOI training cycle targeting officials in charge of tax audits, especially for the segment of taxpayers that are the most exposed to cross–border transactions, with already more than 200 officials trained in EOI, including through the Global Forum's Train the Trainer programme.

In addition to the satisfactory results (Largely Compliant) obtained by Cameroon during the two rounds of peer reviews on the EOIR standard in 2016 and 2024, all of these reforms are already bearing fruit in terms of tax revenue mobilisation.

While Cameroon limited itself to responding to requests for information received from its treaty partners when it joined the Global Forum in 2012, it began sending requests abroad as soon as the EOI Unit was set up in 2015. Since 2023, specific objectives have been assigned to tax auditors on the use of the EOI in the audit of taxpayers' cross–border transactions. Thanks to these efforts, Cameroon now sends twice as many EOI requests as it receives. In 2022 and 2023, 49 requests for information were sent compared with 24 received within the same period. This has made it possible to clarify the situation of several taxpayers and thus to collect EUR 84 million in additional revenue.

The revenue generated by tax audits supported by EOI probably does not sufficiently illustrate the deterrent effect of the EOI on improving taxpayers' compliance. Cameroon has recorded several cases of taxpayers correcting their tax returns as a result of the deterrent effect of EOI, as demonstrated by the two examples below.

Case study 2: Deterrence of EOIR

During a general audit of the accounts of a taxpayer in 2023, the audit department noted commissions of over EUR 2 million *(FCFA 1.4 billion)* paid by the taxpayer to a partner located in a European jurisdiction. When questioned, the taxpayer admitted having purely economic links and denied the existence of any capital link with this partner. The nature of the link between these two companies was fundamental to determine the tax treatment of this expense. Following a threat to send a request for information to the European jurisdiction in question, the taxpayer finally admitted that he did indeed have a capital link with the said partner, which made it possible to adjust the tax base and issue an assessment of Corporate Income Tax and tax on capital gains of over EUR 700 000 (FCFA 466.8 million).

These admissions also made it possible to obtain information on the identity of the beneficial owner of the foreign company from the taxpayer, who happened to be the majority shareholder of the Cameroonian company.

Case study 3: Impact of EOIR – doubling revenues

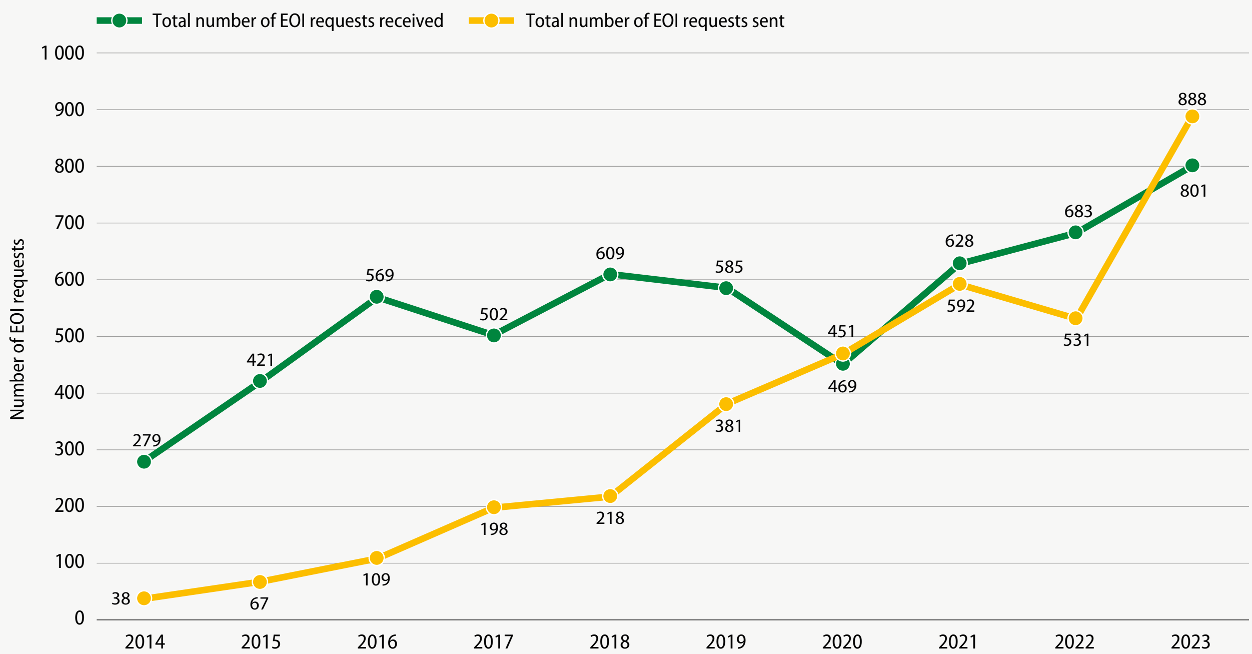
The latest tax audit of the taxpayer, an industrial company based in Cameroon, in 2022 resulted in a tax assessment of EUR 3 million (FCFA 1.5 billion). In 2023, in view of the taxpayer's behavior, the tax authorities decided to examine his cross–border transactions. A request for information was sent to an Asian jurisdiction and the response was straightforward. As a result of the information obtained, the tax authorities identified additional taxes of EUR 4.5 million (FCFA 2.9 billion), i.e. twice what the taxpayer had voluntarily paid before the obtention of the information from abroad.

Following the two assessments, the monthly returns of the two taxpayers have improved significantly and are being closely monitored by the tax administration.

These results provide ample evidence of Cameroon's ability to harness "information capital" to mobilise tax resources.

Source: Directorate General of Taxes, Cameroon

FIGURE 17. **Requests for information sent and received by African countries since 2014**



Note: The graph reflects the situation of 41 African countries which provided data.

Source: Tax Transparency in Africa Survey 2024.

In 2023, for the second time since the launch of the Africa Initiative in 2014, African countries were net senders of requests and made the highest number of requests ever in a year: the 41 African countries that responded to the survey made 888 requests and received 801 requests (see Figure 17). In addition, there was a 40% increase in the number of requests made compared to 2022: they made a total of 888 in 2023, rising from the 531 requests made in 2022.

The number of African countries sending requests remains 19, as was the case in 2019 and 2022. However, four countries (Cameroon, Kenya, Tunisia and Uganda) accounted for 84% of all requests sent in 2023. Of these four, Kenya (30%) and Tunisia (40%) accounted for over 70% of all requests made. As shown in Figure 18, the number of countries sending more than 20 requests rose to 8 up from the previous high of 4 recorded from 2020 to 2022. All this points to a positive dynamic in favour of the use of EOIR by African jurisdictions. However, 22 countries did not make any request at all. A total of 6 African countries were net senders of requests (Cameroon, Ghana, Kenya, Nigeria, Tunisia and Uganda) but the rest still receive more requests that they make.

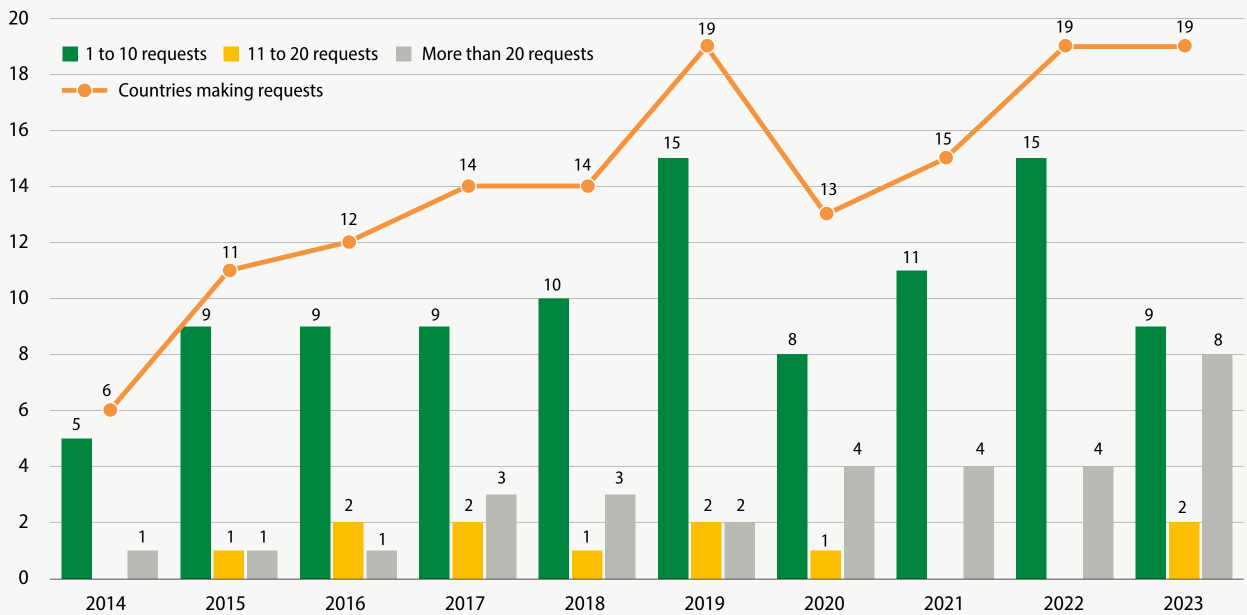
This uneven progress underscores the importance of continuous efforts to make tax auditors, investigators and other compliance officials aware of the benefits of using EOI in cases with a cross–border element and the need for the senior management in tax authorities to embed EOI in their strategy for combating tax evasion and broadening the tax base.

Figure 17 also shows the number of EOI requests sent to African countries rose by 17% to 801 compared to 683 requests in 2022. A total of 24 African countries received EOI requests in 2023, compared to 19 in 2022. Eight countries (Algeria, Egypt, Kenya, Mauritius, Morocco, Seychelles, South Africa and Tunisia) received 89% of all incoming requests with three countries (Kenya, Mauritius and Morocco) accounting for more than 61% of all requests received.

In 2023, 29% of the requests made and 26% of the requests received were made to or received from other African countries. In the same year, 32% of the top five exchange partners for outgoing requests were fellow African countries, while 21% of the top five exchange partners for incoming EOI requests were other African countries (see Figure 19). In 2023, African countries sent requests to Kenya, Mauritius and South Africa and received requests from Kenya, Tunisia and Uganda. The increasing intra–African EOI is a positive trend that should be encouraged as it demonstrates that EOI is an effective tool to tackle tax evasion from outside and from within the continent. This is a safeguard to the risk of increased tax evasion in the context of the African Continental Free Trade Area.[1]

1. The African Continental Free Trade Area Agreement entered into force in 2019 and is aimed at creating the world's largest free trade area bringing together all African countries and the eight Regional Economic Communities. As part of its mandate, it is aimed at eliminating trade barriers and boosting intra–Africa trade. For more information see https://au.int/en/taxonomy/term/677.

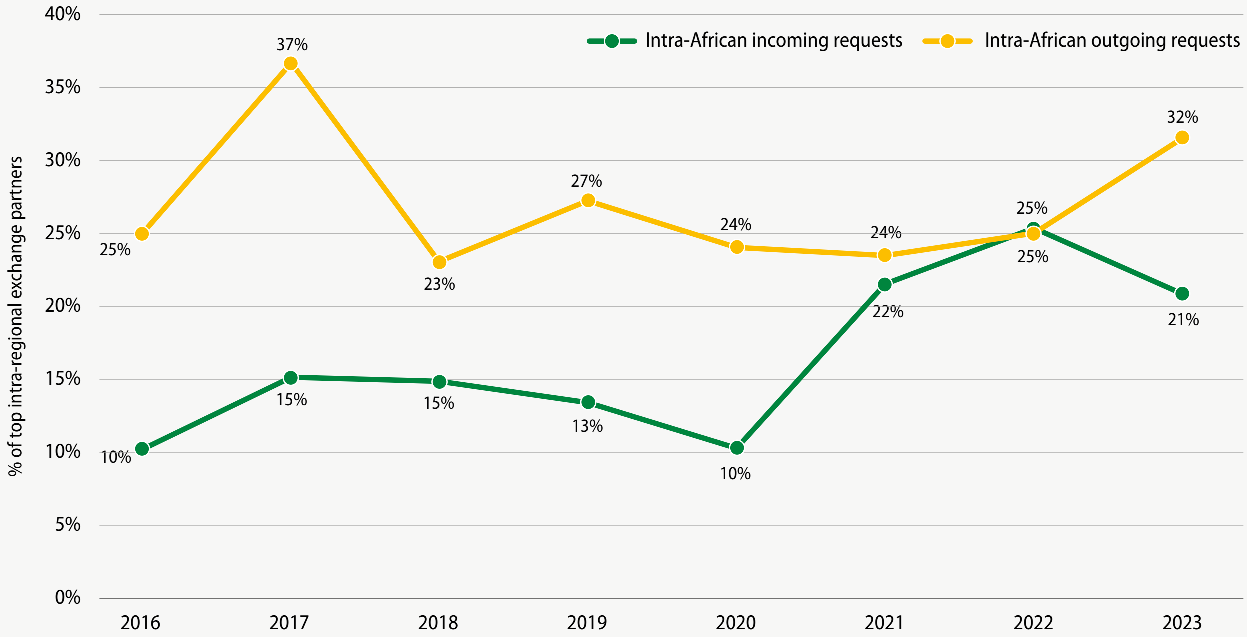
FIGURE 18. **Number of African countries sending requests for information**



Note: The graph reflects the situation of 41 African countries which provided data.

Source: Tax Transparency in Africa Survey 2024.

FIGURE 19. **Evolution of top–five African exchange partners of African countries**



Note: This graph reflects the situation of 41 African countries who responded to the Tax Transparency in Africa Survey 2023. Please note that the number of African countries participating in the survey has significantly increased over years and therefore the sample size varies across years.

Source: Tax Transparency in Africa Survey 2024.

14th meeting of the Africa Initiative, 28 November 2023, Lisbon, Portugal.

16th Global Forum plenary meeting, 29 November-1 December 2023, Lisbon, Portugal.

USE OF AUTOMATIC EXCHANGE OF INFORMATION BY AFRICAN COUNTRIES

CRS data is only useful to recipient countries if they can match the information received to taxpayer information already held in their domestic databases. A higher matching rate is not only an indicator of good quality of the information received; it also indicates that the recipient country has appropriate infrastructure for making effective use of CRS data. While the matching rate of African countries is still below the global average of 80%,[2] it is in an upward trajectory and has risen to an average of 42.7% up (for three countries) from 20% in 2018 (for two countries). The Secretariat continues to provide African countries with technical assistance to enable them to achieve higher matching rates and make effective use of CRS data.

All five African countries reported using CRS data received for pre–filing tax returns, taxpayer notifications, risk assessments and tax audits.

One of the many benefits of AEOI is its complementarity with EOIR. AEOI enables tax authorities to access bulk taxpayer information which when matched to the domestic taxbase can be used for a variety of purposes. CRS data can be used to make more targeted EOI requests for open tax investigations. In 2023, Ghana and Nigeria reported making 17 follow–up EOI requests based on CRS data received, while Mauritius reported making two follow–up EOI requests based on CRS data sent to other countries.

As AEOI has a powerful deterrent effect, many jurisdictions take advantage of its implementation to launch VDPs prior to their first automatic exchanges. These VDPs aimed at encouraging the tax residents to declare their offshore financial assets and settle any related taxes before the tax authority receives this information automatically. Two African countries have made use of VDPs connected to starting AEOI and identified over EUR 637 million in additional revenue. Globally, VDPs have allowed for the identification of more than EUR 90 billion in additional revenues, with at least 1.6 million taxpayers making use of them.[3] The establishment of a VDP when implementing AEOI is an important policy decision. Guidance and technical support are available to inform decision–makers on the pros and cons of establishing such a programme, as well as to identify the key element to consider, to ensure a successful programme.[4]

2. OECD (2023), *Pioneering Global Progress in Tax Transparency: A Journey of Transformation and Development – 2023 Global Forum Annual Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

3. OECD (2023), *Pioneering Global Progress in Tax Transparency: A Journey for Transformation and Development – 2023 Global Forum Annual Report,* Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, op. cit.

4. See Guidance on the implementation of an AEOI–related VDP available at https://www.oecd.org/tax/transparency/documents/documents–available–to–tax–authorities–upon–request.htm.

5

Looking ahead

Since the Africa Initiative was established in 2014, African countries have made significant progress in using tax transparency and EOI to enhance DRM. However, further efforts are required to ensure that all African countries can effectively implement the tax transparency standards and benefit from them to their full potential.

Most African countries have now put in place the essential building blocks for participating in EOI. However, the use of the EOI tools remain uneven on the continent and below its potential. The Africa Initiative will continue to develop capacities to ensure that African countries actively use EOI and benefit from it by providing training to tax auditors and EOI officials, including through the Train the Trainer programme and other new innovative programmes.

Despite its huge potential, only a limited number of African countries are exchanging information automatically under the CRS. The Initiative will provide support to enable African countries that are not yet committed to AEOI by a specific date to consider a date for first exchanges. This available support includes a Preliminary Maturity Assessment of their tax authorities' ISM arrangements aimed at providing the countries with a high–level appraisal of their current ISM arrangements and consequently their overall standing vis–à–vis the CDS requirements of the AEOI standard. This assistance provides the basis for identifying any ISM issues that may require improvement and then inform preparatory work for implementing the AEOI standard. It is also intended to help inform participating countries' decisions on the possible timeline for AEOI implementation as well ensuring that they meet the CDS requirements of other forms of automatic exchange (e.g. Country–by–Country Reporting and the CARF).

African countries that are committed to first automatic exchanges by a specific date will continue to receive support in 2024 that enables them to put in place all the building blocks that are essential for participation in AEOI, including completing the international legal framework (such as signing the CRS–MCAA) and domestic legal frameworks, consultation with financial institutions and establishing relevant IT infrastructure (such as onboarding the CTS). African countries that are already exchanging information automatically will continue receiving tailored technical assistance to develop, enhance or implement an administrative compliance strategy that ensures that financial institutions comply with their due diligence and reporting requirements, prepare for AEOI peer reviews and address gaps, if any, identified in the context of such reviews, and make effective use of the CRS data.

Capacity–building on tax transparency and EOI is one of the key mandates of the Global Forum. In 2024, the Global Forum Secretariat and partners to the Africa Initiative will organise training events on different facets of tax transparency and EOI to address the specific needs of African tax authorities. This includes collaboration with the network of Train the Trainer programme to continue delivering impactful training to their fellow officials, as well as promoting gender balance through the Women Leaders in Tax Transparency programme. In addition, new targeted training and capacity–building initiatives will be considered to enhance the use of EOIR requests in African tax administrations during their audit and investigation processes.

Finally, the Global Forum Secretariat will continue to spread awareness on CBAR based on the toolkit published in 2023 and on a model manual to be launched in 2024, to guide interested countries on the management and handling of CBAR requests. Bilateral technical assistance will be provided to African countries interested in putting in place an enabling domestic and international legal framework, as well as establishing administrative structures necessary for participation in this form of administrative assistance.

Capacity–building on tax transparency and EOI is one of the key mandates of the Global Forum. In 2024, the Global Forum Secretariat and partners to the Africa Initiative will organise training events on different facets of tax transparency and EOI to address the specific needs of African tax authorities.

6 Annex

Summary of the tax transparency progress by country in 2023

Country	Membership	Technical assistance programme	Implementation of EOIR standard		EOI infrastructure		
			1st round	2nd round	CA delegation	EOI Unit	EOI resources and tools
Algeria	2021	Induction programme	–	Review in Q4 2024	Yes	Yes	In progress
Angola*	2023	Induction programme–	–	Review in Q1 2026	Yes	Yes	In progress
Benin	2017	Induction programme	–	Preparation in progress Review in Q4 2024	In progress	In progress	In progress
Botswana	2011	A la carte	LC in 2016	PC in 2019 LC in 2023	Yes	No	Yes
Burkina Faso	2012	A la carte	LC in 2016	Review launched in Q4 2023	Yes	Yes	Yes
Cabo Verde	2018	Induction programme	–	Preparation in progress Review in Q3 2024	Yes	Yes	Yes
Cameroon	2012	A la carte	LC in 2016	LC in 2023	Yes	Yes	Yes
Chad	2016	Induction programme	–	No action taken. Review in Q1 2026	Yes	No	Yes
Congo	2022	Induction programme	–	Review in Q4 2025	Yes	No	No
Cote d'Ivoire	2016	Induction programme	–	Phase 1 in 2021 Phase 2 in Q4 2023	Yes	Yes	Yes
Democratic Republic of the Congo	2023	Induction programme	–	Review in Q4 2026	No	No	No
Djibouti	2017	Induction programme	–	No action taken. Phase 1 in Q3 2023	–	–	–
Egypt	2016	Induction programme	–	PC in 2024	Yes	Yes	Yes
Eswatini	2018	Induction programme	–	Preparation in progress Phase 1 in Q2 2024	Yes	In progress	Yes
Gabon	2012	A la carte	LC in 2016	Phase 1 in 2022 Phase 2 in Q1 2025	Yes	Yes	Yes
Gambia	Non–member	–	–	–	Yes	No	No

EOI network and MAAC status Very narrow <10 Narrow <50 Wide <100 Very wide >100	EOI strategy	Effective use of EOI over the last 3 years None Low <10; Medium <50 High <100 Very High >100	Revenue gains identified	AEOI standard	
				Confidentiality and data safeguards framework	AEOI commitment
Narrow	–	Low	No	No action	No
Very narrow Invited to sign in 2022	–	None	No	No action	No
Very wide MAAC in force since 2023	In progress	None	No	No action	No
Very wide MAAC in force since 2021	In progress	None	No	No action	No
Very wide MAAC in force since 2023	In progress	Low	Yes	No action	No
Very wide MAAC in force since 2020	In progress	None	No	No action	No
Very wide MAAC in force since 2015	Yes	Medium	Yes	Technical assistance ongoing	First exchanges intended in 2026
Very narrow MAAC initiated in 2017	No	None	No	No action	No
Very narrow MAAC process not initiated	No	None	No	No action	No
Narrow MAAC initiated	In progress	None	No	No action	No
Very narrow MAAC process not initiated	In progress			No action	No
Very narrow MAAC process not initiated	–	–	–	No action	No
Wide MAAC process initiated in 2022	–	–	–	No action	Pilot project with UK
Very wide MAAC in force since 2021	No	Low	No	No action	No
Very narrow MAAC not ratified	No	None	No	No action	No
Narrow MAAC process not initiated	No	None	No	No action	No

Country	Membership	Technical assistance programme	Implementation of EOIR standard		EOI infrastructure		
			1st round	2nd round	CA delegation	EOI Unit	EOI resources and tools
Ghana	2011	A la carte	LC in 2014	PC in 2018 Work in progress to address the deficiencies	Yes	Yes	Yes
Guinea	2019	Induction programme	–	Review in Q3 2024	No	No	No
Guinea–Bissau	Non member	–	–	–	No	No	No
Kenya	2010	A la carte	LC in 2016	LC in 2024	Yes	Yes	Yes
Lesotho	2013	A la carte	LC in 2016	Phase 1 launched in Q2 2022 Phase 2 in Q2 2026	Yes	Yes	Yes
Liberia	2009	A la carte	Legal framework appropriate in 2016	PC in 2020 Work in progress to address the deficiencies	Yes	Yes	Yes
Madagascar	2018	Induction programme	–	Review launched in Q4 2023	No	No	No
Malawi	Non–Member	–	–	–	No	No	No
Mali	2020	Induction programme	–	Preparation in progress Review in Q1 2026	No	No	No
Mauritania	2012	A la carte	LC in 2016	Phase 1 launched in Q4 2022 Phase 2 in Q4 2026	Yes	Yes	In progress
Mauritius	2009	A la carte	LC in 2014	C in 2017	Yes	Yes	Yes
Morocco	2011	A la carte	LC in 2016	LC in 2022	Yes	Yes	Yes
Namibia	2019	Induction programme	–	Preparation to be launched in Q3 2024	No	Yes	No
Niger	2015	Induction programme	–	Review in Q3 2026	Yes	No	No
Nigeria	2011	A la carte	LC in 2016	LC in 2023	Yes	Yes	Yes

EOI network and MAAC status Very narrow <10 Narrow <50 Wide <100 Very wide >100	EOI strategy	Effective use of EOI over the last 3 years None Low <10; Medium <50 High <100 Very High >100	Revenue gains identified	AEOI standard	
				Confidentiality and data safeguards framework	AEOI commitment
Very wide MAAC in force since 2013	In progress	Low	No	Re–assessment scheduled in 2020	First exchange in 2019
Very narrow MAAC process not initiated	No	None	No	No action	No
Very narrow MAAC process not initiated	No	None	No	No action	No
Very wide MAAC in force since 2020	Yes	Very High	Yes	Technical assistance on going	First exchanges intended in 2024
Narrow MAAC initiated in 2017, but not completed	No	Low	No	No action	No
Very wide MAAC in force since 2021	No	Low	No	Technical assistance – preliminary assessment in 2018	No
Very narrow Signed MAAC in 2022 but not yet in force	No	None	No	No action	No
Very narrow MAAC process not initiated	No	None	No	No action	No
Narrow MAAC process not initiated	No	Low	No	No action	No
Very wide MAAC in force since 2022	No	None	No	No action	No
Very wide MAAC in force since 2015	No	Medium	No	Successfully assessed	First exchange in 2018
Very wide MAAC in force since 2019	In progress	Medium	No	Technical assistance – preliminary assessment on going	First exchanges intended in 2025
Very wide MAAC in force since 2021	In progress	None	No	No action	No
Very narrow MAAC process not initiated	No	None	No	No action	No
Very wide MAAC in force since 2015	In progress	Very High	No	Technical assistance – preliminary assessment in 2020	First exchanges in 2020

Country	Membership	Technical assistance programme	Implementation of EOIR standard		EOI infrastructure		
			1st round	2nd round	CA delegation	EOI Unit	EOI resources and tools
Rwanda	2017	Induction programme	–	Phase 1 launched in Q4 2023	Yes	Yes	Yes
Senegal	2012	A la carte	LC in 2016	Review launched in Q3 2023	Yes	Yes	Yes
Seychelles	2009	A la carte	LC in 2016	PC in 2023. Supp. review in Q1 2025	Yes	Yes	Yes
Sierra Leone	2023	–	–	Review in Q2 2026	Yes	No	No
South Africa	2009	A la carte	C in 2013	LC in 2022	Yes	Yes	Yes
Tanzania	2015	Induction programme	–	Phase 1 in 2021 Phase 2 in Q3 2025	Yes	Yes	Yes
Togo	2016	Induction programme	–	Phase 1 in 2023 Phase 2 in Q3 2026	Yes	Yes	Yes
Tunisia	2012	A la carte	Legal framework appropriate in 2016	LC in 2020	Yes	Yes	Yes
Uganda	2012	A la carte	LC in 2016	Review launched in Q2 2023	Yes	Yes	Yes
Zambia	2024	Induction programme	–	Review in Q1 2027	Yes	No	No
Zimbabwe	2023	Induction programme	–	Review in Q2 2026	Yes	No	No

EOI network and MAAC status Very narrow <10 Narrow <50 Wide <100 Very wide >100	EOI strategy	Effective use of EOI over the last 3 years None Low <10; Medium <50 High <100 Very High >100	Revenue gains identified	AEOI standard	
				Confidentiality and data safeguards framework	AEOI commitment
Very wide MAAC in force since 2022	No	Low	No	Technical assistance ongoing	First exchanges intended in 2025
Very wide MAAC in force since 2016	No	Medium	Yes	Technical assistance ongoing	First exchanges intended in 2025
Very wide MAAC in force since 2015	No	Medium	No	Successfully assessed	First exchanges in 2017
Very narrow MAAC process not initiated	No	Low	No	No action	No
Very wide MAAC in force since 2014	Yes	High	Yes	Successfully assessed	First exchanges in 2017
Very narrow MAAC process not initiated	In progress	Low	No	No action	No
Narrow MAAC signed in 2020, but not in force	In progress	None	Yes	No action	No
Very wide MAAC in force since 2014	Yes	Very high	Yes	Technical assistance ongoing	First exchanges intended in 2025
Very wide MAAC in force since 2016	Yes	High	Yes	Technical assistance ongoing	First exchanges intended in 2025
Very narrow MAAC process not initiated	No	None	No	No action	No
Very narrow MAAC process not initiated	No	Low	No	No action	No

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