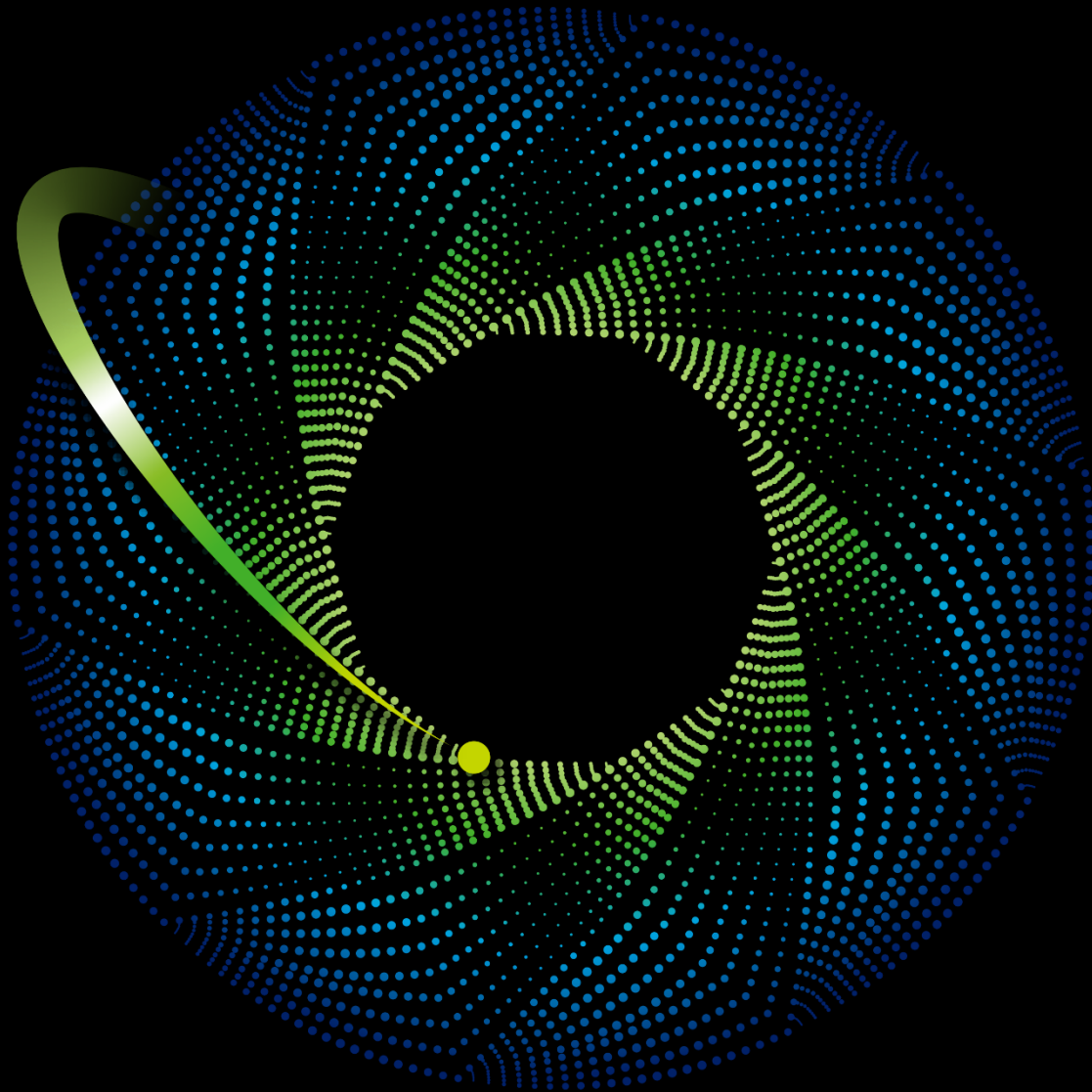


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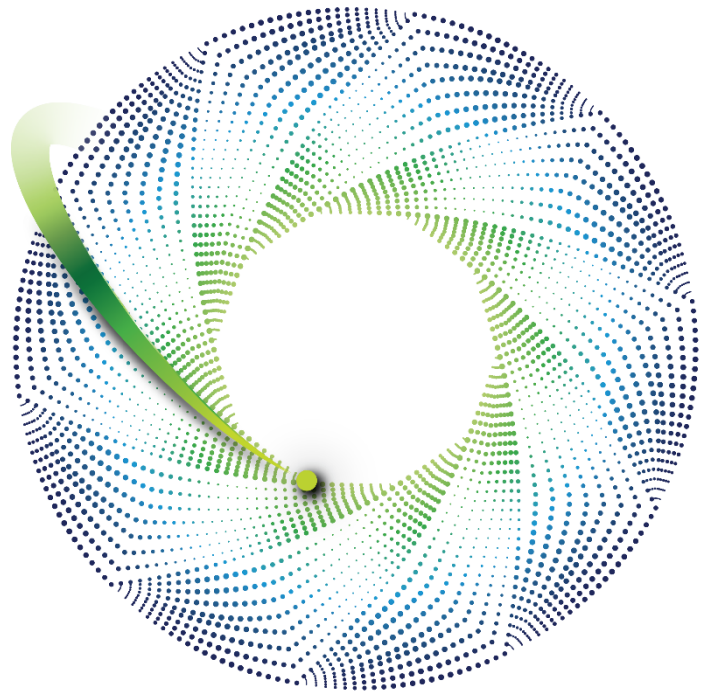
## Deloitte Africa Tax Pulse

Your go-to newsletter for the latest tax developments across the continent

August 2025

## Introduction

Welcome to the Deloitte Africa Tax Pulse, your go-to newsletter for the latest tax developments across the continent.



As African economies evolve, governments are implementing new tax policies to enhance revenue collection, promote transparency, and streamline compliance. These changes significantly impact businesses, individuals, and key industries.

In this edition, we cover Uganda's expanded mandatory use of the Electronic Fiscal Receipting and Invoicing Solution (EEFRIS), Zambia's introduction of a minimum alternative tax and Botswana's VAT Amendment Bill.

Stay informed and prepared as we navigate Africa's evolving tax environment together.



## Uganda

### EFRIS Expansion: URA mandates e-invoicing for 12 new sectors

The Uganda Revenue Authority (URA), through **General Notice No. 2218 of 2025**, expanded the mandatory use of the Electronic Fiscal Receipting and Invoicing Solution (EFRIS) to **Twelve (12) additional sectors**, including real estate, transportation, manufacturing, construction, Information and Communication Technology, and professional services among others, **effective July 1, 2025**. This expansion aims to broaden the tax net and enhance tax compliance and transparency.

Affected taxpayers must ensure their invoicing systems are integrated with URA-approved solutions to avoid penalties.

### Tax Tribunal rules against Shoprite Checkers on VAT assessment

On 12 August, the ruling (TAT Application No. 30 of 2023), the Tax Appeals Tribunal dismissed a claim by Shoprite Checkers (U) Limited regarding a substantial value-added tax (VAT) assessment. The ruling addresses an application by Shoprite challenging additional assessments for VAT, PAYE, and a rental tax penalty.

Shoprite argued that the tax was based on "inter-divisional sales" which were not taxable. However, the Tribunal sided with the URA, finding that the company failed to prove its claim.

Consequently, Shoprite Checkers (U) Limited must pay Shs. 1.3 billion in VAT.

A separate dispute over a PAYE assessment is to be resolved through reconciliation.

## Zambia

### Introduction of a minimum alternative tax

A minimum alternative tax (MAT) calculated at the rate of 1% of total turnover has been introduced. This is payable even when the taxpayer is loss-making. However, taxpayers on turnover tax or presumptive tax regimes are exempted from MAT. Accordingly, MAT only applies to taxpayers whose annual turnover is more than K5 million.

MAT applies in addition to the normal income tax. However, this is not a final tax. The amounts paid during the year can be credited against future income tax liabilities for up to five years, following which the unutilised MAT is forfeited.

The effective date of MAT is yet to be announced. Further, regulations for the administration, assessment, collection, and recovery of MAT have not yet been published by the Minister.

[Click here to learn more](#)



## Zambia

### Increase of the withholding tax rate on government securities from 15% to 20%

Tax required to be deducted from the payment of interest on treasury bills and government bonds is increased to 20% from 15%. This is a final tax in the case of individuals and non-resident investors. For resident corporate investors, this is allowed as a tax credit against the final corporate income tax, currently payable at a rate of 30%.

This change is open to interpretation as there is no clarity in the text of the law on whether the change in the rate to 20% applies to issues of government securities made prior to the amendment. Accordingly, guidance will be required on the application of this change.

[Click here to learn more](#)

## Southern Africa



## Botswana

### VAT Amendment Bill, 2025

The Value Added Tax (VAT) Amendment Bill, 2025 (the Bill) presented to the National Assembly was circulated to the public at large in August 2025.

The aim of the Bill is to introduce the taxation of remote services and mandate electronic invoicing. The Bill also proposed to modernise the current VAT system with focus on enhancing revenue collection and improve tax compliance through digital transformation.

The Bill introduced the terms and definition of remote services, electronic fiscal device (EFD), fiscal receipts, government entity, taxable activity and electronic marketplace.

Furthermore, the Rules for Remote Services is added as Part III(A) in the proposed Bill.



## South Africa

### Can SARS collect the R800 billion on its own?

Over the last few years, we have heard from the South African Revenue Service (SARS) and its Commissioner, Edward Kieswetter, that South Africa faces a massive tax gap estimated at R800 billion annually. Depending on who you ask, this estimate fluctuates between R200 billion to R800 billion. However, this estimate depends largely on how the tax gap is defined.

The article highlights SARS' efforts to close a significant tax gap through various initiatives and increased funding, while also addressing the challenges posed by the government's failure to fulfill its social contract with taxpayers.

[Click here to read more](#)

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