

TIWB Programme N° L2015-0001

Host Administration:
Zambia Revenue Authority (ZRA)

Expert source:
**Organisation for Economic Co-operation and Development (OECD) and
African Tax Administration Forum (ATAF)**

Programme Dates:
June 2016 – December 2018

Zambia's economy remained strong with growth above 6% in 2015/16. The country's tax-to-GDP ratio averaged 14% for the 2015/16 period and there was a need for a significant improvement in domestic revenue mobilisation. Zambia indicated their interest to the TIWB Secretariat for assistance on general audit issues in the international tax area in late 2015. TIWB-style support was provided by ATAF and OECD experts during three onsite missions, including ad-hoc remote assistance from June 2016 to December 2018. Multiple audit cases were progressed, some of which were in the mining sector. Main tax issues covered included transfer pricing (TP) issues related to intangibles, intra-group financing and intra-group services.

Impact of the practical audit assistance programme

The TP audit assistance programme helped Zambia achieve the following results:

- **Human Resource development - Skill and knowledge transfer:** Twenty-five Host Administration officials learned to effectively assess risks throughout the audit process, particularly the risk of excessive capital deductions and potential overstatement of expenses and assets. In addition, the training provided comprehensive understanding of the mining industry value chain. They also gained substantial knowledge in various TP transactions.
- **Institutional Development – Legislative changes, tools, process and procedures:** ATAF/OECD Experts recommended changes to the draft TP legislation, regulations and general audit processes which have now been implemented.
- **Other Outcomes:** This programme provided a foundation for future collaboration leading to additional TIWB programmes with ZRA.