



Value-Added Tax Administration and Allocation Formula Challenges in Nigeria

Dr. Aliyu Idris

Revenue mobilisation Allocation and Fiscal Commission

Date of Submission: 01-12-2024

Date of Acceptance: 09-12-2024

Abstract

This study examines the critical issues surrounding the value-added tax administration and the challenges of the allocation formula in Nigeria. The persistent debate over VAT derivation principles and revenue sharing formula has highlighted disparities in resource distribution and fiscal autonomy. The study adopts applied research leverage on qualitative methodology, to explore the historical context, challenges, and implications of the VAT revenue allocation formula and found that the silence of the constitutional provision on VAT created a serious fiscal framework gap and inequities in the administration and allocation formula for distribution to the three tiers of Government. It recommends that the current bills before the National Assembly should empower the Revenue Mobilisation allocation and Fiscal Commission as an empire arbiter to develop a fair just and equitable VAT formula to reflect consumption patterns and support economically weaker states for national cohesion.

I. Introduction

The recent controversies and judicial interventions by Rivers and Lagos states have intensified debates on whether the VAT formula should adhere to the derivation principle or remain a centrally administered consumption tax. The controversy, primarily triggered by disagreements between federal and state governments has raised fundamental questions about fiscal federalism, equity, and constitutional governance in Nigeria. While proponents of the derivation principle argue that VAT should primarily benefit states where taxable goods and services are consumed, critics emphasized the need for equitable redistribution to support the weaker economies states and national cohesion.

The ongoing debate over value-added tax (VAT) derivation and allocation formula has brought the role of the Revenue Mobilisation Allocation and Fiscal Commission into sharp focus. The Revenue Mobilisation Allocation and Fiscal Commission (RMAFC) plays a pivotal role in Nigeria's fiscal

framework, tasked with ensuring an equitable revenue-sharing formula among the three tiers of Government. The RMAFC's constitutional mandate is critical to the stability and fairness of the nation's resource allocation system.

The VAT was introduced in 1993 to modernise Nigeria's tax system and has since evolved into a key revenue source. Initially, implemented as a replacement for the sales tax. VAT was designed to expand the tax base and boost non-oil revenue. The VAT rate which was 5% since its inception was increased to 7.5% through the Finance Act 2020. Over the years, its administration and allocation have faced numerous challenges, including inefficiencies in the collection, tax evasion, and disputes over the centralisation of VAT revenues.

1.1 Statement of the Problems

VAT revenue is a vital component of Nigeria non-oil revenue contributing significantly to the country's fiscal sustainability. However, disputes over its allocation formula have highlighted critical challenges regarding divergent interpretations of VAT derivation principles, conflict between federal and state governments on VAT administration and arbitrary revenue allocation formula undermining fairness and equity vertically or horizontally.

The conflict arises from the silent of the VAT provision in the 1999 constitution and inadequateness of information on the factors and principles of derivation to ascertain the acceptable formula that is fair, just and equitable for the three tiers of government.

This paper tends to address the Gap on the VAT administration and allocation formula by exploring the historical, legal and economic dimension to VAT revenue and come up with acceptable VAT allocation formula that is fair and just to enhance fiscal harmony.

1.2 Objectives of the Study

The general objectives of this study is to assess the VAT administration and the complexities



surrounding its allocations while the specific objectives are as follows:

- i. To explore the historical development and challenges of VAT allocation in Nigeria.
- ii. To evaluate the judicial intervention and the constitutional implication.
- iii. To analyse the constitutional role of the RMAFC in revenue Allocation.
- iv. To highlight the implications of arbitrary VAT allocation on national unity and fiscal equity.

II. Review of the Related Literature

2.1 Conceptual Framework

VAT is a consumption tax levied on the value added at each stage of production and distribution, with the final consumer bearing the burden. It is unique in its design as a centrally administered tax that is redistributed among the three tiers of government. This redistribution is meant to reflect principles of equity, ensuring that all regions benefit regardless of their economic strength. The debates surrounding VAT allocation have been framed by concepts of fiscal federalism, economic justice, and resource equity.

2.2 Historical Context of VAT in Nigeria

Several scholars have explored the historical evolution of VAT in Nigeria. Olusola (2020) highlights that VAT replaced the Sales Tax in 1993 as part of broader reforms to modernize Nigeria's tax system. Its introduction aimed to address inefficiencies in tax administration and diversify revenue sources away from the over-reliance on oil revenues. Over the years, amendments to the VAT Act have sought to enhance compliance and improve administration, but challenges such as tax evasion and disputes over jurisdiction have persisted.

Adeola (2021) discusses the 2020 increase in VAT rates from 5% to 7.5%, which was part of the Federal Government's efforts to boost non-oil revenues. While the rate hike was lauded for increasing government revenue, it also sparked concerns over its impact on businesses and consumers, particularly in states with lower economic activity.

2.3 Current Controversies and Judicial Rulings

The allocation of VAT revenues has become increasingly contentious. States like Rivers and Lagos have argued for the right to administer VAT within their jurisdictions, citing the derivation principle as enshrined in the 1999 Constitution. Judicial rulings, such as the Federal High Court's decision in favour of Rivers State in 2021, have

added complexity to the discourse. Okonkwo and Ayodeji (2022) note that these rulings underscore the need for constitutional clarity and consistency in VAT administration.

On the other hand, proponents of centralized VAT administration argue that it ensures equitable redistribution and supports national unity. They contend that allowing states to collect VAT independently could lead to fiscal imbalances and widen economic disparities among regions.

2.4 Fiscal Federalism Theory

The theory of fiscal federalism proponent by Musgrave, R. (1952) & Wallace E, O. 1972 underpinned this study. The fiscal federalism theory provides a useful lens for analysing VAT allocation in Nigeria. This theory advocates for a balanced approach to resource distribution, ensuring that all levels of government have adequate resources to fulfil their responsibilities. By emphasizing equity and collaboration, fiscal federalism seeks to promote economic development while safeguarding national cohesion. Applying this framework, VAT allocation must strike a balance between recognizing consumption patterns and supporting less economically developed states.

III. Methodology

This study adopts descriptive and exploratory research design. Descriptive research is used to capture and document the existing legal, political, and administrative landscape of VAT allocation in Nigeria, including the roles and mandates of the Revenue Mobilisation Allocation and Fiscal Commission (RMAFC). Exploratory research is employed to understand the emerging tensions and debates surrounding VAT derivation and allocation formula, particularly focusing on the interactions between federal and state governments.

This research design allows for a comprehensive understanding of the problem at hand and the formulation of recommendations to address the challenges posed by VAT allocation formula disputes in Nigeria.

Data Collection Methods

The research utilizes multiple qualitative data collection techniques to ensure comprehensive coverage of the VAT administration and its allocation challenges in Nigeria. The data collection methods employed include:

3.1 Documentary Analysis.

A critical aspect of the data collection involves reviewing key policy documents, statutes, and historical records. The Value Added Tax Act



(1993) and subsequent amendments, as well as court rulings on VAT allocation, were analysed to understand the legal framework that governs VAT allocation in Nigeria. Additionally, reports from the Federal Inland Revenue Service (FIRS), Revenue Mobilisation Allocation and Fiscal Commission (RMAFC), and other related governmental and academic publications were examined. The documents reviewed were:

- i. The 1999 constitution of the Federal Republic of Nigeria.
- ii. The VAT Act. No. 102 of 1993.
- iii. Finance Act, 2019.
- iv. Court rulings on VAT administration, especially the Federal High Court ruling in favour of Rivers State.
- v. Past Revenue Mobilisation Allocation and Fiscal Commission Revenue Allocation Formulae Report.

IV. Data Analysis

The data analysis process involves the following steps:

Thematic Analysis (that is analysis and interpretation in themes or patterns within data). The thematic analysis was used to identify, analyse, the following written documents:

- i. The 1999 constitution of the Federal Republic of Nigeria.
- ii. The VAT Act. No. 102 of 1993.
- iii. Finance Act, 2019.
- iv. Court rulings on VAT administration, especially the Federal High Court ruling in favour of Rivers State.
- v. Past Revenue Mobilisation Allocation and Fiscal Commission Revenue Allocation Formulae Report.

4.1 Content Analysis of Legal Documents.

The legal texts, including the VAT Act, constitutional provisions, and judicial rulings, were subjected to content analysis. This method helps systematically

interpret and analyse legal terminology, principles of fiscal federalism, and the constitutional roles of relevant bodies like RMAFC. The content analysis focused on the discrepancies and conflicts in VAT allocation policies that have sparked ongoing legal and political debates.

4.2 Comparative analysis.

The comparative analysis was conducted between Nigeria's VAT allocation system and those of other federations with similar fiscal structures such as South Africa and India. This helped the study to contextualize Nigeria's VAT allocation within international best practices and offer recommendations for improvement.

4.3 Validity and Reliability Test

To ensure the validity and reliability of this research findings, a triangulation (that is collecting of data or documents from different sources) was employed to cross-check and verify the consistency of information. A peer review of the findings was conducted by experts in constitutional law, taxation, and fiscal policy to ensure the study's accuracy and robustness.

4.4.1 Limitations of the study

While the study aims to provide comprehensive insights into VAT allocation in Nigeria, it is important to acknowledge the following limitations: Access to Data: Gaining access to private sector opinions on VAT allocation may be limited, especially from businesses that are directly affected by VAT policies.

Geographical Scope: The research faced challenges in obtaining comprehensive data from all Nigerian states due to logistical constraints.

V. Results and Discussion

Comparative Analysis of VAT Administration and Allocation Formula in Nigeria, South Africa and India

| Aspect | Nigeria | South Africa | India |
|--------------------|--|--|---|
| VAT Administration | Centralized collection by the Federal Inland Revenue Service (FIRS). States have contested this, seeking decentralization for fiscal federalism. | Administered by the South African Revenue Service (SARS), with a well-established and unified structure. | Dual GST system: Central Goods and Services Tax (CGST) and State Goods and Services Tax (SGST), with separate administration. |
| VAT Rate | 7.5% under the 2020 Finance Act | Standard rate of 15%, with some exemptions and zero-rated items | Rates vary between 5% and 28%, depending on goods and services. |
| Allocation Formula | Federal Government: 15%, States: 50%, Local Governments: 35%; states' shares are based on equality (50%), population (30%), and derivation (20%) | Revenues go to the central government, funding national priorities, with redistribution to provinces | State shares depend on consumption within the state, encouraging local development efforts. |



| Aspect | Nigeria | South Africa | India |
|-----------------|--|--|---|
| Legal Framework | Governed by the VAT Act (1993) and amended by the Finance Act 2020; recent controversies over state control of VAT collection. | Defined under the Value-Added Tax Act of 1991, emphasizing national cohesion in tax administration | Enacted under the GST Act of 2017; designed for cooperative federalism with shared governance. |
| Challenges | Disputes between federal and state governments over collection rights; weak enforcement in some states. | Balancing equitable redistribution while maintaining collection efficiency. | Complexity in administering dual GST; compliance and reconciliation issues among states and the centre. |

Sources: Nigeria VAT Act,2020; South Africa VAT Act 1991; India GST Act,2017

Court Ruling on VAT Administration

The legal dispute between the Rivers State Government and the Federal Government over Value Added Tax (VAT) culminated in a Federal High Court (FHC) ruling favouring Rivers State. The court's decision, delivered in August 2021, declared that the Federal Government lacked the constitutional authority to impose and collect VAT in states, asserting that such powers belong exclusively to state governments.

Constitutional Basis

The court rules that the Federal Government's authority to impose taxes is limited to items explicitly listed under the 1999 constitution, such as income tax, capital gain tax, and stamp duties. VAT, being a form of sales tax, falls outside this scope and resides within the legislative competence of states.

Invalidity of the VAT Act

The VAT Act was deemed unconstitutional because it extends beyond the legislative powers granted to the National Assembly under the Constitution. Consequently, the court invalidated the VAT Act and the Taxes and Levies (Approved list for collection) Act for being inconsistent with the constitutional provision. The Rivers State Government was declared constitutionally empowered to impose, collect, and administer VAT within its jurisdiction. Following the ruling, River State enacted its VAT law, imposing VAT at 7.5%.

Order of Perpetual Injunction

The FHC issued an order restraining the Federal Inland Revenue Service (FIRS) from collecting VAT or any similar sales tax in Rivers State.

Implications

The judgement shifts VAT administration to state governments, potentially disrupting revenue-sharing arrangements under the federal VAT regime. However, the FIRS appealed the ruling on September 10th, 2021, seeking a stay of execution to maintain the status quo. This created legal and practical challenges for businesses, faced with dual demands for VAT compliance from both state governments and the FIRS.

VI. Findings

The findings of this study were drawn from analyses of various data sources, including legal documents, policy reports, and group discussions. The major findings were organized into thematic areas that reflect the critical issues identified in the research. These areas include the constitutional and legal framework, the political and economic implications, the regional disparities in VAT allocation, and the judicial interventions. Additionally, the findings include discussions on the challenges faced in the current VAT allocation system and recommendations.

6.1 Constitutional and Legal Framework of VAT Allocation

- One of the key findings is the inclusion of the arbitrary allocation of VAT revenue in the VAT Act which contravenes section 162 (2) of the 1999 constitution which empowers the Revenue Mobilisation Allocation and Fiscal Commission to allocate all revenue to the three tiers of Government. The 1999 Constitution of the Federal Republic of Nigeria (as amended) does not explicitly allocate VAT collection and distribution between the federal and state governments, leaving a gap that has led to disputes over authority. The Value Added Tax of 1993, which regulates VAT collection, provides some guidance but does not adequately address the issue of VAT derivation and the constitutional role of the Revenue Mobilisation Allocation and Fiscal Commission (RMAFC).

- **Interpretation of constitution:** The constitution is silent on VAT allocation and this lacuna has created confusion. While VAT is seen as a federally collected tax, states argue that they are entitled to a share of VAT proceeds based on their contribution to the tax base.

- **Lack of legal clarity:** The absence of a clear and enforceable constitutional mandate on VAT allocation has led to legal ambiguity, which has fuelled the conflict between the federal and state governments. The study revealed that this lack of clarity was particularly evident in the legal



proceedings following the Rivers State vs FIRS case, where the Federal High Court ruled in favour of Rivers State, granting it the right to collect VAT within its jurisdiction. This ruling has been a flashpoint in the ongoing VAT allocation debate.

- **Political and Economic Implications:** The political and economic implications of the VAT allocation dispute are significant, particularly in terms of governance and intergovernmental relations. These implications reflect the fiscal federalism model in Nigeria and how the allocation system impacts the country's financial management.

- **Political Tension:** The research found that the VAT dispute has intensified political tensions between state and federal governments, particularly in states that contribute significant revenue through VAT, such as Lagos and Rivers. Governors from these states argue that they are being short-changed by the federal government's control of VAT revenues, which are primarily distributed based on the arbitrary VAT Act sharing ratio. Lagos and Rivers States argued that the federal government has disproportionately benefited from VAT collections without equitable distribution to the states that generate the tax revenue.

- **Economic Discontent:** Several business owners and economic analysts expressed frustration over the inefficiency of VAT collection and distribution, citing delays in remittances and the administrative bottlenecks involved in tax allocation. The uncertainty surrounding VAT allocation has made it difficult for businesses to plan their financial operations, especially in states with more significant tax bases.

- **Impact on Fiscal Autonomy:** The findings also point to the growing need for fiscal autonomy among the states. States that generate substantial VAT revenues argue that they should be able to retain a greater share of the VAT proceeds to fund local infrastructure and public services. This tension is compounded by the fact that some states, particularly those in northern Nigeria, have a lower VAT base and are therefore less impacted by the current distribution formula.

- **Regional Disparities in VAT Allocation:** A significant finding is the regional disparity in VAT collection and the perceived inequities in the allocation formula. The study revealed that VAT allocation does not adequately reflect the economic realities of the various states, with certain states receiving disproportionately low or high shares based on the formula set by the VAT Act.

- **Lagos and Rivers State:** As the two highest contributors to VAT revenue, Lagos and Rivers are particularly vocal in their demands for greater control

over VAT collected within their borders. From the case studies of these states, it became clear that both states are seeking greater fiscal autonomy in the collection and allocation of VAT, especially in light of the growing financial demands for infrastructure, healthcare, and education. These states argue that a fairer VAT system should take into account their economic contribution, including their role as key hubs for trade and commerce.

- The Lagos State Government has also voiced concerns about the lack of benefits derived from the VAT collections, given that the state generates a substantial portion of Nigeria's overall VAT revenue but does not receive a corresponding share of the funds. Rivers State, on the other hand, has taken the bold step of enacting its own VAT law, aiming to collect and retain VAT within the state, highlighting the frustration with the federal government's control over this resource.

- **Northern regions:** Conversely, argued that the VAT tax is a consumer tax and most goods are consumed in the northern part of Nigeria, therefore, the northern state supposed to benefit more and not the state where the company headquarters are domiciled. The Eastern states argued that uniform VAT distribution based on population or land mass alone is unfair, as it does not reflect the varying capacities of states to generate tax revenue.

VII. Conclusions

VAT is a cornerstone of Nigeria's non-oil revenue system, playing a vital role in the fiscal stability of all tiers of government. Its unique nature as a consumption tax necessitates a careful and equitable allocation framework to prevent regional disparities and foster national cohesion. The current debates over derivation and centralization underscore the complexities of Nigeria's federal fiscal system and the critical importance of constitutional governance.

The Revenue Mobilisation Allocation and Fiscal Commission (RMAFC), as the constitutionally mandated arbiter of revenue allocation, must be empowered to develop a VAT formula that reflects principles of fairness, justice, and equity. This formula should account for VAT's consumption-driven nature while ensuring that economically weaker states receive adequate support to bridge regional disparities.

By adhering to RMAFC's recommendations and reinforcing its constitutional authority, Nigeria can resolve the VAT derivation issue and build a more harmonious and sustainable fiscal framework. Such an approach will enhance trust in the revenue-sharing system, strengthen national unity, and position VAT



as a model for equitable resource allocation in a federal system.

VIII. Recommendations

Based on the findings of this study, several key recommendations are proposed to address the issues surrounding VAT allocation in Nigeria. These recommendations focus on creating a fairer, more transparent, and efficient VAT allocation system that promotes fiscal autonomy, economic stability, and national cohesion. The recommendations are categorized into legal and constitutional reforms, administrative reforms, fiscal policy changes, and intergovernmental collaboration.

1) **Legal and Constitutional Reform:** The lack of a clear and explicit constitutional framework for VAT allocation has been identified as one of the primary challenges in the current system. To address this, the following legal and constitutional reforms are recommended:

- **Amendment of the 1999 Constitution (as amended):** The Constitution of Nigeria should be amended to explicitly define the roles and responsibilities of the federal and state governments in VAT collection and distribution. This should include clear provisions on the derivation Principle for VAT allocation, allowing states to retain a fair share of the VAT the derivation principle generates as stipulated for the allocation of other taxes.

- A constitutional amendment could establish a fiscal framework for revenue sharing that accommodates the economic realities of different states. This would help avoid future legal disputes and provide a stable foundation for VAT allocation.

- **Explicit Recognition of VAT in the Constitution:** VAT should be integrated into the Constitution or made an exclusive law that overrides conflicting state laws. This will prevent situations where states enact their own VAT laws, as seen with River State, which could lead to a fragmented tax system. A national uniform policy on VAT collection and distribution should be prioritized.

- Federal and state governments should have a clearly defined legal relationship when it comes to VAT, ensuring that the federal government's role in administering VAT is balanced with state rights in claiming a share based on regional contributions.

2) **Judicial Review Mechanism:** Given the increasing role of the judiciary in shaping VAT allocation, the judicial review mechanism is necessary. This would allow for the resolution of

VAT disputes through a formal process that includes all relevant stakeholders, such as the RMAFC, State Governments, and the Federal Inland Revenue Service, to ensure that decisions are made in accordance with national fiscal policies.

3) **Administrative Reforms:** The study also highlighted the administrative inefficiencies in the current VAT allocation system, particularly regarding delays in remittance and the lack of transparency in the allocation process. To enhance the administrative effectiveness of VAT collection and distribution, the following reforms are proposed:

- **Decentralisation of VAT collection:** States with significant VAT bases, such as Lagos and Rivers should be granted the autonomy to collect VAT locally and retain a portion of the VAT revenues. This decentralization will allow for better local control over tax revenues and improve fiscal responsibility at the state level.

- A dual collection system could be introduced, where the federal government continues to collect VAT at the national level but allows states to directly collect VAT on transactions within their jurisdictions. This would require establishing state-level revenue Agencies to handle VAT collection and ensure compliance with tax laws.

- **Improving Revenue Tracking and Monitoring:** To ensure transparency and reduce fraud, the RMAFC should implement an advanced digital platform for online tracking VAT revenues in real-time. This would enable both the federal government and states to access up-to-date data on VAT collections and distributions, minimizing delays and discrepancies in the allocation process.

- **Annual Auditing by independent auditors** should be introduced to verify VAT collections, ensuring that the funds allocated to each state are accurate and reflect actual tax revenue generated within the state's jurisdiction.

- **Creation of a national body under the oversight of the RMAFC.** A national VAT body could be created to manage the coordination of VAT collection across all states. This body would standardize VAT procedures, set collection targets and ensure that states are not under-reporting or over-claiming VAT proceeds. The national body could also mediate between state and federal governments in the event of disputes over VAT distribution.

- **Incentivise Compliance:** The federal government should incentivise states to increase VAT compliance by providing them with performance-based rewards. States that demonstrate high levels of tax compliance and transparency in their VAT collection efforts could be granted



additional financial support or autonomy in managing local VAT revenue.

4) Fiscal Policy Change: To address the regional disparities in VAT allocation, fiscal policy reforms are necessary. These policies should reflect the diverse economic strengths of Nigeria's states and ensure a fairer distribution of tax revenues. The following fiscal policy recommendations are proposed:

- Review of the current Revenue sharing formula: The Revenue Mobilisation Allocation and Fiscal Commission should initiate a comprehensive review of the current revenue sharing formula, taking into account the derivation principle and economic capacity of each state. This reform should consider states' contributions to national VAT revenue, population sizes, and development needs, ensuring that states like Lagos and Rivers are compensated fairly for their tax contributions.

References

- [1]. Alesina, A., & Spolaore, E. (2003). *The size of Nations*. This book explores the economic and political implications of federalism and the distribution of resources, providing valuable context for understanding VAT allocation in a federal system like Nigeria. MIT Press.
- [2]. Bird, R. M., & Zolt, E. M. (2005). *Taxation and Development: The weakest Link: The World Bank*. A key reference for understanding the role of taxation in development, with a focus on emerging economies and federal systems.
- [3]. Teddlie, C., & Tashakkori, A. (2009). *Foundations of mixed Methods Research; Integrating Quantitative and Qualitative Approaches in the Social and Behavioural Sciences*. Sage Publications.
- [4]. Eze, I. O. (2019). "Fiscal Federalism and Revenue Allocation in Nigeria: Implications for National Integration." *Journal of African Economic*, 28(1), 47-65.
- [5]. Fagge, M. A., & Dauda, R. O. (2020). "VAT Collection and Fiscal Responsibility in Nigeria's Federal System." *Nigerian Journal Economic Policy Development*, 12(2), 102-118.
- [6]. Olusegun, A. O., & Olanrewaju, M. F. (2017). "Challenges in Nigeria's Tax Administration: The Case of VAT." *International Journal of Public Sector Management*, 30(4), 324-345.
- [7]. Zinn, H. (2018). "Decentralization and the Role of Subnational Governments in Taxation." *Public Administration Development*, 38(2), 150-163.
- [8]. Federal Ministry of Finance. (2021). *National Tax Policy of Nigeria*. Federal Government of Nigeria.
- [9]. Revenue Mobilisation Allocation and Fiscal Commission (RMAFC). (2020). *Annual Report Revenue Allocation in Nigeria*. RMAFC.
- [10]. National Bureau of Statistics (NBS). (2022). *Nigeria Statistical year Book* NBS.
- [11]. Office of the Accountant-General of the Federation (OAGF). (2021). *Report on VAT disbursement and State Allocation*. OAGF.
- [12]. Constitution of the Federal Republic of Nigeria. (1999). (As amended).
- [13]. Value Added Tax Act, Cap. V1, Laws of the Federation of Nigeria. (2004).
- [14]. National Economic Council (NEC). (2020). *Report on Intergovernmental Fiscal Relations and Revenue Allocation* NEC.
- [15]. Ojediran, K. A. (2021). "Rivers State VAT Law: A Legal Perspective." *Legal Studies Journal*. Retrieved from www.legalstudiesjournal.com.
- [16]. Olamide, M. (2021). "The Debate Over VAT in Nigeria's Federal System." *The Guardian Nigeria*. Retrieved from www.theguardian.ng.
- [17]. Federal Inland Revenue Service (FIRS), (2022). *VAT Collection and Remittances in Nigeria: Challenges and Prospect*. Retrieved from World Bank Group. (2020). "Nigeria's VAT Policy and Its Role in Sustainable Development." *World Bank Report on Taxation*. Retrieved from www.worldbank.org.
- [19]. International Monetary Fund (IMF). (2020). "VAT Reforms and Fiscal Transparency in Africa." *IMF Country Report No. 20/118*.
- [20]. kuneye, S. T. (2021). "The Role of VAT in Nigeria's Fiscal Federalism." *African Tax Journal*, 8(1), 75-92. Retrieved from www.africantaxjournal.org.