



Federal Government Issues Transition Guidelines for Tax Acts 2025

The Federal Government has issued the General Guidelines for the implementation of the Tax Acts 2025, setting out the process for transition from the repealed tax laws to the new tax framework effective from January 1, 2026.

Issued by the Federal Ministry of Finance, the Guidelines provide direction to taxpayers, tax practitioners, revenue authorities and other stakeholders on how to address various issues arising from the old regime to the new framework.

Under the Guidelines, the Tax Acts 2025 comprising the Nigeria Revenue Service (Establishment) Act, the Nigeria Tax Act, the Nigeria Tax Administration Act, and the Joint Revenue Board (Establishment) Act apply from the respective commencement dates as enacted in each law. In particular, January 1, 2026 for the Nigeria Tax Act, 2025.

Tax liabilities, assessments, audits, investigations, disputes and enforcement actions relating to periods before that date will be treated under the repealed tax laws.

Tax returns relating to accounting periods ending before January 1, 2026, will be filed under the previous tax laws, while returns relating to accounting period ending from January 1, 2026, onward will be administered under the new tax framework.

The document also covers the treatment of income taxes, transaction taxes, development levies, tax incentives, exemptions, record-keeping obligations and transactions that span both the old and new tax regimes.

Existing tax incentives and exemptions granted under the repealed laws will remain in place until their expiration dates. New applications and pending requests, however, will be considered under the provisions of the Tax Acts 2025.

Speaking on the release of the Guidelines, the Honourable Minister of Finance and Coordinating Minister of the Economy, Mr. Taiwo Oyedele, said the document provides a framework for managing transitional issues while ensuring that the new laws are not applied retrospectively.

He described the Tax Acts 2025 as a significant milestone in Nigeria's tax reform programme, noting that the Guidelines set out how existing obligations, ongoing matters and future transactions will be treated under the new regime.

According to the Minister, the Guidelines are anchored on three key principles – clarity, fairness and administrative certainty.

The Guidelines are intended to promote uniform implementation and support effective administration across the Nigeria Revenue Service, State Internal Revenue Services, the FCT Internal Revenue Service, Local Government Revenue Committees, tax practitioners and taxpayers nationwide.

The Government reaffirmed its commitment to building a transparent, efficient and modern tax system that supports economic growth, strengthens revenue administration, encourages voluntary compliance and improves Nigeria's investment climate.

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