

The Federal Inland Revenue Service (FIRS or "the Service") has recently issued an official Public Notice introducing the National E-Invoicing Regime through the Electronic Fiscal System (EFS) specifically designed for Large Taxpayers. You may download a copy of the Public Notice here.

This Public Notice officially announces the launch of the E-invoicing solution under the Merchant Buyer model, effective 1 August 2025. This follows a successful pilot phase that began in November 2024, during which the Service implemented the system with select large taxpayers, conducted comprehensive onboarding sessions, and engaged stakeholders across key economic sectors.

Starting 1 August 2025, the pilot phase will end, and all large taxpayers (defined as businesses with an annual turnover of \$\mathbb{H}\$5 billion or more) will be required to register for and onboard the E-invoicing solution. These taxpayers must integrate their invoicing systems with the FIRS' platform to enable real-time invoice generation, validation, and transmission through the designated E-invoicing channels.

To facilitate a smooth transition, the Service will offer technical support to taxpayers and software solution providers, host continuous training programs, onboarding workshops, and provide access to detailed integration documentation.

Commentaries

This initiative represents a major milestone in the digital transformation of Nigeria's tax administration system, significantly enhancing operational efficiency and promoting the adoption of modern technology. The introduction of the E-invoicing regime replaces outdated paper-based invoicing system while reducing administrative burdens and minimising errors.

Moreover, the regime aligns with the Federal Government's broader objective of expanding the tax base and increasing government revenue collection. Large taxpayers and all stakeholders should note the implementation timeline, considering the recent Tax Reform Acts that mandate the use of government-approved fiscal systems and impose penalties for noncompliance. It appears that non-resident companies earning turnover equivalent to \text{\mathbf{N}}5 billion in foreign currency may be required to implement the E-invoicing solution.

It is important that all companies, even those outside the revenue threshold, begin preparations early and leverage the support the FIRS has undertaken to provide. In this regard, they will need to assess their state of readiness for the scheme and identify what needs to be done to be fully prepared for implementation. There may be a

need to upgrade or adapt their existing infrastructure to integrate seamlessly with the FIRS EFS platform. Businesses may also need to review and redesign their invoicing processes to ensure compliance. One important consideration that is often underestimated is the need for change management strategy to ensure smooth transition and address any potential challenges.

For further insights, you can access KPMG's detailed publication on the E-invoicing solution here. KPMG stands ready to assist organisations in navigating the complexities of e-invoicing, ensuring full compliance with the evolving tax laws and regulations.

