

Summary of Special Incentives for Manufacturers and Exporters

| | Registered Manufacturers | Exporters of Manufactured Goods | Export Processing Zone Enterprises |
|-------------------------------------|---|---|--|
| Eligibility and Registration | <ul style="list-style-type: none"> Enterprises engaged in manufacturing. Application to the Ministry of Trade and Industry and approval by the Ministry of Finance. | Enterprises that export manufactured goods whether produced in Namibia or not. Application and approval by the Ministry of Finance. | Enterprises engaged in manufacturing, assembly, packaging or break-bulk and exporting mainly to outside of SACU markets. Application to the EPZ Committee through the ODC or EPZMC |
| Corporate tax | Set at a rate of 18% for a period of 10 years, whereafter it will revert to the general prevailing rate. | 80% allowance on income derived from exporting manufactured goods. | Exempt |
| VAT | Exemption on purchase and import of manufacturing machinery and equipment. | Normal treatment. | Exempt |
| Stamp & Transfer Duty | Normal treatment. | Normal treatment. | Exempt |
| Establishment Tax Package | Negotiable rates and terms by special tax package. | Not eligible. | Not eligible |
| Special Building Allowance | Factory buildings written off at 20% in first year and balance at 8% for 10 years. | Not eligible. | Not eligible |
| Transportation Allowance | Allowance for land-based transportation by road or rail of 25% deduction from total cost. | Not eligible. | Not eligible. |
| Export Promotion Allowance | Additional deduction from taxable income of 25%. | Not eligible. | Not eligible |
| Incentive for Training | Additional deduction from taxable income of between 25% and 75%. | Not eligible. | Substantial, issued by Government on implementation of approved training programme |
| Industrial studies | Available at 50% of cost | Not eligible | Not eligible |
| Cash Grants | 50% of direct cost of approved export promotion activities. | Not eligible. | Not eligible |



REPUBLIC OF NAMIBIA

SPECIAL INCENTIVES FOR MANUFACTURERS AND EXPORTERS

SPECIAL INCENTIVES FOR MANUFACTURERS AND EXPORTERS

Introduction

The Government of the Republic of Namibia is committed to stimulate economic growth and employment and to establish Namibia as a gateway location in the Southern African region.

Incentives are largely concentrated on stimulating manufacturing in Namibia and promoting exports into the region and to the rest of the world.

The following tax general regulations are indicative of Government commitments:

- Non-resident Shareholders' Tax is only 10 percent;
- Dividends accruing to Namibian companies or resident shareholders are tax-exempt;
- Plant, machinery and equipment can be fully written off over a period of three years;
- Buildings of non-manufacturing operations can be written off, 20 percent in the first year and the balance at 4 percent over the ensuing 20 years (manufacturers operations have even more generous allowances);
- Import or purchase of manufacturing machinery and equipment is exempted from Value Added Tax (VAT);
- Preferential market access to the EU, USA and other markets for manufacturers and exporters is provided.

To make manufacturing in Namibia more competitive, Government has introduced a further package of tax and non-tax incentives, applicable to both existing and new manufacturing enterprises.

Companies operating under the regime are free to locate their operations anywhere in Namibia.

Through the Offshore Development Company, EPZ enterprises also have access to factory facilities rented at economical rates.

REGISTRATION AND IMPLEMENTATION

All manufacturing concerns claiming incentives must first register with the Ministry of Trade and Industry, and, in respect of Taxation Incentives, must also be registered with the Ministry of Finance. The Minister of Finance is empowered to prescribe accounting procedures and regulations for manufacturing enterprises qualifying for Taxation Incentives. To promote control and prevent the misuse of Taxation Incentives, enterprises qualifying for such incentives will not be relieved on the duty to submit fully substantiated annual tax returns.

For further details please contact:

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To obtain EPZ status, applicants should apply to the Namibia Investment Centre

or
The Chief Executive Officer
Offshore Development Company
Private Bag 13379
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or
The Manager
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INCENTIVES FOR EXPORTERS OF MANUFACTURED GOODS

Tax allowance on income derived from the export of manufactured goods
Government intends to promote Namibia as a trading centre within Southern Africa. Taxable income derived from the export of manufacture goods, with the exception of fish and meat products, whether they have been produced in Namibia or not, shall be reduced by an allowance equal to 80 percent of the amount.

EXPORT PROCESSING ZONE (EPZ) INCENTIVES

Enterprises which undertake manufacturing, assembly, re-packaging and break-bulk operation and gear all or almost all of their production for export, earn foreign exchange and employ Namibians, will be eligible for EPZ status, which confers an attractive range of both tax and non-tax benefits.

Tax incentives for EPZ enterprises

Enterprises with EPZ status do not pay:

- corporate tax;
- import tax;
- sales tax, stamp and transfer duties on goods and services required for EPZ activities.

These benefits are of unlimited duration.

Other incentives for EPZ enterprises

Because Government recognises the considerable costs of establishing new operations and training a new workforce, EPZ enterprises investing in upgrading the skills and productivity of Namibian workers will receive a grant to cover a substantial part of the direct costs of on-the-job and institutional training. The grant is paid by the Government on the basis of pre-approved training plans, once training is complete.
EPZ enterprises are also allowed to hold foreign currency accounts in local banks.
They also enjoy industrial calm as no strikes or lock-outs are allowed in the EPZ-regime.

INCENTIVES FOR MANUFACTURERS

Tax Incentives for Manufacturers

Tax abatement

The Government has allowed a 50 percent special tax deduction on the taxable income derived from manufacturing enterprises for a period of five years, to be phased out on a straight-line basis over a subsequent period of 10 years. This abatement is applicable to all operations approved and registered as manufacturers by the Ministry of Finance in consultation with the Ministry of Trade and Industry.

Establishment tax package for new investments

Where companies wish to establish a new manufacturing venture in Namibia, or relocate an existing operation to Namibia, a special tax package may be negotiated through the Ministry of Trade and Industry, which then makes appropriate recommendations to the Ministry of Finance. The Minister of Finance is empowered to grant, in consultation with the Minister of any line Ministry, special conditions to certain manufacturing enterprises on:

- the rate of tax payable, and
 - the terms under which this rate shall apply.
- To be considered for an establishment tax package, a full feasibility study must be presented showing that:
- existing industry will not be unfairly disadvantaged, and
 - the enterprise will contribute positively to Namibia's long-term economic growth.

The conditions, as negotiated, will be published in the Government Gazette as soon as they have been approved by the Ministry of Finance.

Special building allowance

Building erected by manufacturing enterprises for manufacturing purposes (i.e. not including office buildings), can be written off at the rate of 20 percent in the first year and the balance at 8 percent per year over the ensuing 10 years.

Tax incentives for export promotion activities

The following expenditure, which is already fully deductible for tax purposes, will be allowed as an additional deduction from income according to the percentages prescribed in (i) to (iii) below:

- research on the marketing of goods in a foreign country;
- advertising and soliciting of orders in a foreign country, including attendance of approved foreign trade exhibitions and outward trade missions, economy air fare, local travel and accommodation and exhibition costs;
- provision of samples or technical information to prospective customers in a foreign country;
- bringing prospective buyers from a foreign country to Namibia, including economy air fares and accommodation;
- preparation or submission of tenders or quotations in respect of goods to be exported to a foreign country;
- expenditure incurred to finalise contractual agreements;
- the appointment of agents in foreign countries.

The additional deduction in prospect of the above expenses is as follows:

- 25 percent if the current export turnover exceeds the basic export turnover* by 10 percent or less;
- 50 percent if the current export turnover exceeds the basic export turnover by more than 10 percent, but less than 25 percent; or
- 75 percent if the current export turnover exceeds the basic export turnover by 25 percent or more.

*Where the "basic exports turnover" is defined as the average export turnover of the preceding three years, as supported by an audit certificate.

These export promotion incentives will only be granted on approval of the programme, stating details of the envisaged export promotion venture and the expected resultant exports.

Additional deductions for production line wages and training

An additional deduction of 25 percent will be allowed for registered manufacturing enterprises in respect of wages paid to production line workers and training costs.

Production line wages

As an encouragement to manufacturing enterprises to utilise more labour intensive processes, an additional deduction from income of 25 percent will be allowed in respect of wages paid to Namibian workers directly involved in the manufacturing process. For example if an enterprise has an approved

remuneration package of N\$100,000 to such workers, N\$125,000 will be allowed as a deduction from taxable income.

Training expenses

The Government believes that efficiency in the manufacturing sector can be increased dramatically through the professional training of technical personnel. An additional deduction of 25 percent from income will be allowed on approved technical training expenses. The content, duration and costs of training programmes and a list of candidates must be forwarded to and approved by the Ministry of Finance, in consultation with the Ministry of Trade and Industry and the Ministry of Labour and Human Resource Development.

NON-TAX INCENTIVES FOR MANUFACTURERS

Grants and loans for exporters

To further assist exporters in securing new markets, export promotion funding of efforts as detailed in the previous section, under Tax incentives for export promotion activities, will be considered, up to a maximum of 50 percent of direct costs. Such export promotion activities must be pre-approved by the Investment Centre and can, on the basis of substantive quotations and/or invoices, be paid in advance, subject to full verification of expenditure within 30 days.

Industrial studies

Studies undertaken by Government, whether on its own initiative or on request of private sector enterprises, can be made available at 50 percent of their production cost to companies that wish to develop investment opportunities. Executive summaries will be made available for perusal free of charge. Requests by the private sector for commissioning of such studies will only be considered where full project proposals and pre-feasibility studies are submitted.