



CLIENT ALERT:

Nigeria Revenue Service commences compliance monitoring for large taxpayers under the National E-invoicing & Electronic Fiscal System ('EFS')



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INTRODUCTION

The Nigeria Revenue Service ('NRS') has announced the commencement of compliance monitoring for large taxpayers (businesses with an annual turnover of NGN5,000,000,000 [Five Billion Naira] and above) under the National E-Invoicing & Electronic Fiscal System ('EFS'), also known as the Merchant Buyer Solution ('MBS')¹.

Consequently, all affected taxpayers that have not completed implementation are required to achieve full compliance on or before 31st July 2026. Failure to do so may result in regulatory and enforcement actions in accordance with the applicable tax laws and regulations. The NRS has clarified that compliance extends beyond registration on the platform. Affected taxpayers are expected to complete the onboarding process, integrate their internal systems through approved Access Point Providers ('APPs') or Systems Integrators ('Sis'), conclude all required validation and testing activities, and commence the transmission of invoices through the NRS E-Invoicing platform in accordance with the prescribed standards. The NRS also requires taxpayers to ensure that electronic invoices received from suppliers bear a valid Invoice Reference Number ('IRN').

WHAT THIS MEANS FOR BUSINESSES

The commencement of compliance monitoring marks the transition from implementation to active regulatory oversight of the EFS. Large taxpayers that have not completed onboarding, systems integration and invoice transmission should take immediate steps to conclude the required implementation processes ahead of the 31st July 2026 compliance deadline. Addressing any outstanding implementation gaps before the compliance deadline will help mitigate the risk of regulatory scrutiny and potential enforcement measures under the applicable tax laws.

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¹ <https://www.nrs.gov.ng/news/news/news-release-4>

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