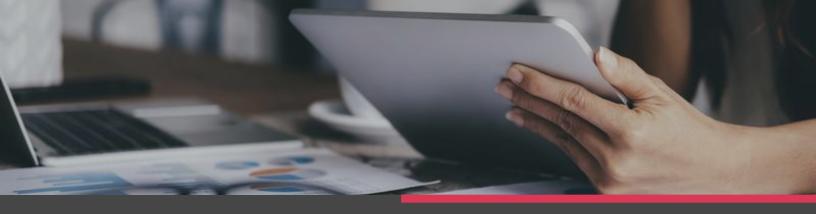






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Introduction

The Guyana national budget for fiscal year 2025 was read in Parliament on 17 January 2025 by the Honourable Dr. Ashni Singh, Senior Minister, Office of the President, with Responsibility for Finance. Subsequently, the Ministry of Finance issued a summary 'Budget 2025 at a glance' dated the 17 January 2025 as well as a Press Statement on 19 January, 2025. As such, these three documents should be read together.

We are pleased to present our national budget memorandum capturing the key fiscal and other related measures.

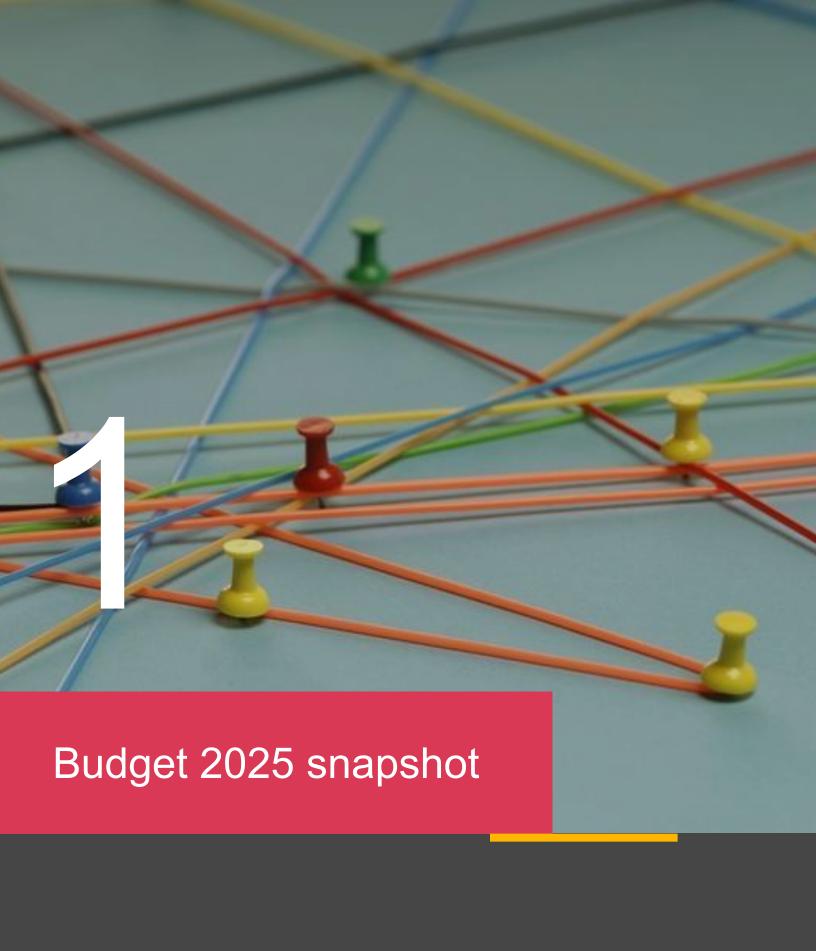
Please note that all figures within this publication are expressed in Guyana dollars GY\$, unless otherwise stated.

We look forward to a productive and robust parliamentary debate for additional details on the proposed measures and their respective effective implementation dates.

In the interim, should you wish to discuss the impact on your organisation of any of the proposed measures, please reach out to PwC Guyana's Tax Services team.

Angelique Bart

PwC Guyana
Territory Tax Services Leader





2024 overview

In 2024, Guyana's economy grew by 43.6%, with the non-oil sector expanding by 13.1%. Growth in the non-oil economy was driven by rice, other crops, and bauxite production, as well as expansion in the construction and services sectors and expansion in other mining and quarrying.



Balance of payments 2024

- The overall balance of payments recorded an estimated surplus of US\$113.8m, driven by higher export earnings.
- Total export earnings grew by 50.7% to an estimated US\$19.8bn in 2024.
- Crude oil exports contributed US\$18bn to overall export earnings in 2024, an increased of 55.4%.
- Non-oil export earnings grew by 16% to US\$1.8bn, with increases in gold, rice and bauxite exports which increased by 22.4%, 20.4% and 19.2%, respectively.



Monetary developments 2024

- In 2024, total private sector credit increased by 19.8%, comprising growth in commercial and household lending.
- The banking sector saw improvements in non-performing loans (NPLs), with the NPL ratio in the stock of total loans declining from 10.8% in 2020 to 1.8% in 2024.
- Total reserves deposited with the Bank of Guyana rose by an estimated 18.3% to \$200bn at the end of 2024.



Inflation

The 12-month inflation rate at the end of 2024 is estimated at 2.9%, driven primarily by food prices, which contributed 2.8 % points of the overall rate.



Fiscal position

- The total non-financial public sector deficit (after grants) was \$365.8bn or 7.1% of GDP.
- At the end of the fiscal year the Central Government recorded a deficit of \$376.4bn or 7.3% of GDP.
- Central Government expenditure was \$1.2tn, exceeding revenue earnings of \$784.6bn.





Natural Resource Fund

- Deposits into the Natural Resource Fund (NRF) for 2024 amounted to US\$2.6bn.
- The NRF balance at the end of 2024 was US\$3.1bn.

2025 targets



Economic growth

Guyana's economic growth is projected to be

10.6%

in 2025, making it the third fastest growing economy in the world.

The non-oil economy is projected to grow by

13.8%



Sectors

Agriculture, fishing and forestry

 The agriculture, forestry, and fishing sector is projected to grow by 11.4%.

Extractive industries

- The mining and quarrying sector is projected to grow by 10%.
- The oil and gas sector is projected to produce 674,000 barrels per day (bpd) of crude oil, increasing to an average of 786,000 bpd in the fourth guarter.
- The gold mining subsector is projected to grow by 17.2%, with a production target of 501,000 ounces.
- The bauxite mining subsector is projected to grow by 70.1%, with a production target of over 4.4m metric tonnes.

Manufacturing

- The manufacturing sector is projected to grow by 13%.
- The sugar manufacturing subsector is projected to grow by 115.4%.
- The rice manufacturing subsector is projected to grow by 9.5%.
- The other manufacturing subsector is projected to grow by 9.8%.

Construction

 The construction sector is projected to grow by 24.8%.

2025 targets (continued)

Services

- The services sector is projected to grow by 8%.
- The wholesale and retail trade and repairs subsector is projected to grow by 8.7%.
- The administrative and support services subsector is projected to grow by 9.8%.
- The information and communication subsector is projected to grow by 5.8%.
- The transport and storage subsector is projected to grow by 9.3%.

Balance of payments

- The overall balance of payments is projected to record a surplus of US\$561.3m. This will be due largely to improvements in the capital account, with the deficit reducing by an estimated US\$4.2bn.
- The current account is projected to register a surplus of US\$2.3bn.
- Non-oil exports are projected to grow by 20.7% to US\$2.2bn, largely on account of higher earnings from gold, bauxite, and rice.
- Crude oil export earnings are projected to decline by 2.1% to US\$17.6bn, due to lower market prices for crude oil expected in 2025.
- Total import payments are projected to increase by 32.3% to US\$9bn.

Monetary policy and inflation

- Monetary policy will focus on containing inflationary pressures and maintaining exchange rate stability.
- The 12-month inflation rate is projected to be 2.8%.

Central government operations

- Central Government's current revenue (net of NRF withdrawal, GRIF, and Carbon Credit inflows) is projected to increase to \$454.6bn in 2025, up from \$437.7bn.
- Tax revenues are expected to contribute 95.5 % of this sum, amounting to \$434.1bn.
- Non-tax revenues are projected to reach \$20.5bn.
- The sale of carbon credits is projected to generate \$41.1bn.
- Central Government's overall spending is projected to increase by 16%.

2025 targets (continued)

Central government operations (continued)

- The overall deficit after grants is projected at \$317.8bn, or 5.9% of GDP.
- Budget 2025 is \$1.382tn, 20.6% greater than Budget 2024.

Natural Resource Fund

- Government is projected to earn US\$2.2bn in profit oil and US\$340.6m in royalties.
- An estimated US\$2.5bn can be withdrawn from the NRF to support the budget.









Adjustments to the income tax threshold

Effective 1 January, 2025, the monthly income tax threshold will be increased from

\$100,000 to \$130,000

per month or \$1,560,000 per annum. This represents a 100% increase in the last five years. This measure is expected to benefit 22,000 persons by removing them from the tax net.

Income tax relief for overtime pay and income from second jobs

Income tax relief will be provided as follows:

- The first \$50,000 of monthly overtime income will be non-taxable for those persons who earn overtime for work beyond their normal working hours.
- The first \$50,000 of monthly income from a second job will be non-taxable for those persons who work a full time primary job.

Adjustments to income tax rates and taxable bands

Currently, income tax applies as follows:

- Chargeable income up to \$2,400,000 28%
- Chargeable income in excess of \$2,400,000 40%

Effective 1 January 2025, the rates of tax for the first and second bands of taxable income will be reduced from 28% to 25% and 40% to 35% respectively. Additionally, the threshold of the first band will be increased from \$200,000 to \$260,000.

This measure will increase disposable income for low to middle income taxpayers payers.

Accordingly, income tax will be applied as follows in income year 2025:

- Annual personal allowance of the higher of \$1,560,000 or 1/3 of chargeable income
- Chargeable income up to \$3,120,000 25%

10

 Chargeable income in excess of \$3,120,000 – 35%

Corporate Tax

Depreciation of capital for poultry farmers

Poultry farmers will be entitled to accelerated depreciation on capital assets, for example, machinery and equipment used in the production processes. This measure is expected to incentivise investment in modern production facilities, improve Guyana's food security and support the reduction of the CARICOM Regional Food Import Bill by 25%.

PwC



Currently, VAT applies at the rate of 14% on the importation items in Guyana. Certain capital equipment and machinery used in the mining, forestry, agriculture, construction and manufacturing sectors enjoy a zero percent VAT rate. To avoid any doubts and to further support expansion of the sector, the government proposes to remove import VAT on the importation of machinery used in the agriculture sector, where VAT has not already been removed.

Additionally, the government proposes to remove VAT on automated poultry pens and veterinary supplies and electricity generators.

Removal of import VAT on the importation of machinery used in the agriculture sector, where VAT has not already been removed.

Removal of VAT on automated poultry pens and veterinary supplies.

Removal of VAT on electricity generators.



Social welfare and other fiscal measures

1

Reduction in electricity costs

The Gas to Energy (GtE) Project which includes a 300 megawatt (MW) combined cycle power plant is slated to be completed in the fourth quarter of 2025. The government estimates that electricity costs will be reduced by 50% benefitting both residential and commercial customers. Given that the cost of electricity in Guyana is among the highest in the Caricom region, the reduction will incentivise local and foreign investment especially in the manufacturing sector and allow Guyanese businesses to be more competitive with their neighbours.

2

Containing the cost of fuel

Due to the volatile nature of fuel prices on the world market, the Government has maintained excise tax on petroleum products at 0% since March 2022. This measure will be maintained for 2025.



Abolition of bridge tolls

The government intends to implement a policy abolishing the payment of tolls to use the Berbice River Bridge, the Wismar River Bridge and the new Demerara River Bridge (which is expected to be operational in the last half of 2025). The policy will apply to all vehicle types and benefit over 50,000 daily commuters.

Social welfare and other fiscal measures

4

Reduction in freight charges

In August 2021, the Government adjusted freight charges to the pre-pandemic levels (31 March 2020) for the purpose of computing import taxes to alleviate high shipping costs which were being passed on to consumers. In light of current increases in freight prices, the Government will extend this measure for a further 12-month period from 1 January 2025 to 31 December 2025. This measure will be welcomed by businesses that rely on transporting goods and equipment via sea to support their operations in Guyana.

6

National Insurance Scheme (NIS)

These measures will be effective from 1 January 2025:

Eligible persons who have reached the age of 60 and who have made contributions ranging from 500-749 will be eligible to receive a full and final grant depending on the year their last contribution was made. This will no doubt be welcomed by senior citizens who have not met the 750 minimum contributions to receive the old age pension.

8

Public assistance

Public assistance will be increased from \$19,000 per month to \$22,000 per month. This measure will take effect from 1 January 2025 and represents more than a 100% increase in the last five years.

5

Continuation of part-time job programme

In 2022 the Government launched a part time job programme which provides the opportunity for one person per household to earn \$40,000 by working 10 days per month in public offices in close proximity to their home. This programme will be continued in 2025 and is aimed at encouraging participants to develop relevant skills for potential transition into full-time employment.

7

Increase in old age pension

Increase old age pension from \$36,000 per month to \$41,000 per month. This measure will take effect from 1 January 2025 and represents a 100% increase in the last five years.

9

Health care voucher

The government proposes to issue a voucher for \$10,000 to contribute towards the cost of a basic suite of health tests for everyone. In 2024, the government introduced a \$3,000 voucher towards the cost of an eye test and a \$15,000 voucher towards the purchase of spectacles for school children and pensioners.

These measures are aimed at promoting universal health care among the population.

Social welfare and other fiscal measures

10

Assistance for parents

The government has introduced or continued a number of measures that are beneficial to parents:

- Introduction of a one-off cash grant of \$100,000 for every newborn baby born in Guyana to a Guyanese mother. Some clarification would be needed such as whether a child born in Guyana to a Guyanese father and non-Guyanese spouse will be eligible for this grant.
- An increase in the annual 'Because We Care' Student Grant from \$40,000 to \$50,000 per child whether the child attends private or public school.
- Continuation of the annual uniform voucher allowance of \$5,000 per child which will result in parents of over 205,000 school children receiving a total of \$55,000 per child when added with the 'Because We Care' Student Grant.
- Introduction of a tax deduction of \$10,000 per month per child. Only one parent is allowed to claim the deduction for each child.

11

Free university and technical and vocational education

With effect from January 2025, current and future students enrolled at the University of Guyana will not be required to pay tuition. This comes on the heels of the debt write-off for persons with outstanding student loans which began in 2023. Additionally, the government is abolishing tuition fees across every government technical and vocational training institution from January 2025. As the government seeks to diversify the economy, an educated workforce is needed to grow the non-energy sector.

12

National cash grant

In October 2024 the government announced a one-cash grant of \$100,000 for every citizen 18 years and over. At the end of 2024, approximately 400,000 citizens were registered for the grant. This grant will be further rolled out this year with an additional \$30bn targeting the coastal regions. On completion of the programme, a total of \$60bn will be placed directly into the pockets of citizens.





Guyana taxes

Individual taxes*

	Current	Proposed changes
Rate of tax	28% for chargeable income up to GY\$2.4m 40% for chargeable income in excess of GY\$2.4m	25% for chargeable income up to GY\$3,120,000 35% for chargeable income in excess of GY\$3,120,000
Personal allowance	Greater of GY\$1,200,000 or one third of income	Greater of GY\$1,560,000 or one third of income
Withholding method	PAYE system	-
Tax due date	14th day of month following payment	-
Allowances available	Telephone, medical, airfare	-
Social security contributions	Employee: 5.6% of insurable earnings Employer: 8.4% of insurable earnings	-

Corporate income tax regime

Type of company	Current corporate tax rate (%)	Proposed corporate tax rate (%)
Telephone companies	45	-
Commercial companies	40	-
Other companies (non-commercial)	25	-
Both non-commercial and commercial	25/40	-
Small business engaged in manufacturing and construction services and registered with the Small Business Bureau	25	-

^{*} A commercial company is one that derives at least 75% of its gross income from goods not manufactured by it or if it is engaged in telecommunication, banking or insurance (other than long-term insurance).

Property taxes rates

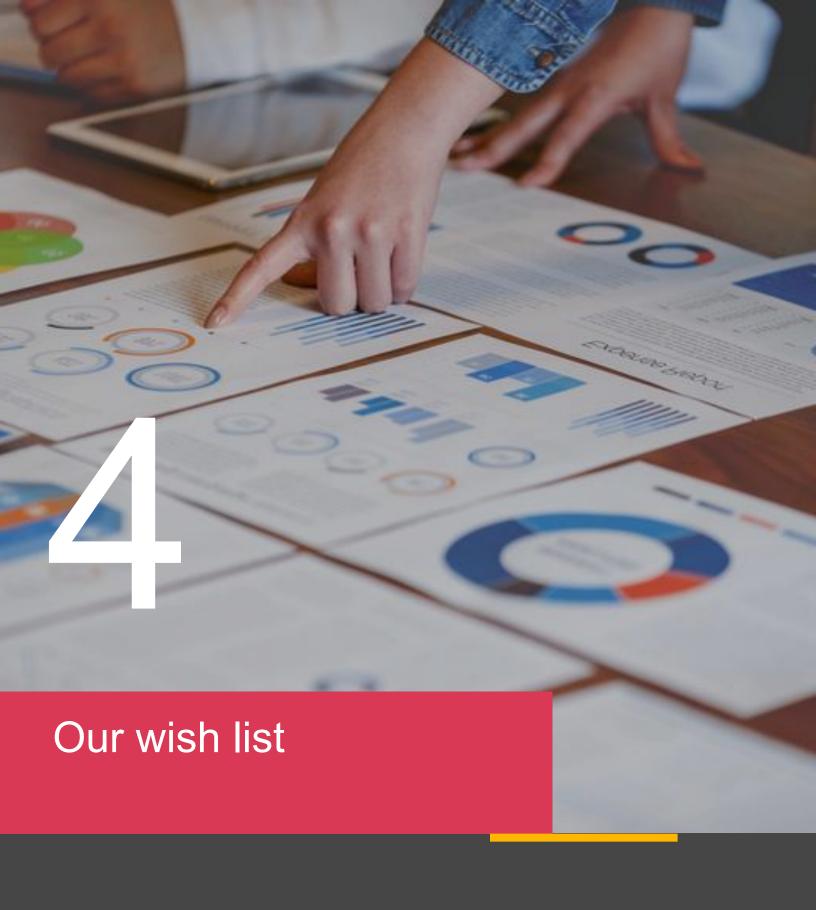
Net property of a company (GY\$)	Current property tax rate (%)	Proposed property tax rate (%)
On the first 40m	0	-
On every dollar of the next 20m	1/2	-
On every dollar of the remainder	3/4	-

Capital allowance (wear and tear) rates

Class of assets	Current rate (%)	Proposed rate (%)
Aircraft	33 1/3	-
Boats	10	-
Buildings (housing and industrial)	5	-
Furniture and fittings	10	-
Motor vehicles	20	-
Electric motor vehicles	50	-
Office equipment, including computers and computer software	50	-
Other office equipment	15	-
Buildings used for providing services and warehousing	2	-
Plant and machinery	20	-
Equipment for industries harnessing alternate energy through wind, solar and biomass technologies	capital expenses to be written off within two years for new equipment	
Beddings, books, bottles, boxes, carpets, clerical robes, cooking, utensils, crockery, cutlery, glass-wear, lasts, linen, linoleums, oars, rugs, sails stoppers, siphons, tarpaulins, loose tools and similar items	to be written off in the year of purchase	

Value-added tax (VAT)

VAT	Current VAT tax rate (%)	Proposed VAT tax rate (%)	
Standard VAT rate	14	-	



Proposed measure	Comments	Impact
Increase treaty network	Guyana has signed four Double Taxation Treaties: • CARICOM • Canada	Barbados has 40 tax treaties in effect, Jamaica has 12, while Trinidad and Tobago currently has 15 tax treaties.
	 United Kingdom United Arab Emirates (not yet ratified in UAE) 	An extensive treaty network is an incentive to direct foreign investment. In addition to providing relief from double taxation, treaties can provide uniformity and certainty on the treatment of issues.
Removal of the dual rate of corporation tax on companies engaged in both commercial and non-commercial activities.	The Guyana Corporate Tax Act currently provides for the imposition of a dual-rate of tax where a company is engaged in the provision of both commercial and non-commercial activities.	The presence of a definition of a commercial company as well as a definition of commercial activity creates an anomaly.
	The legislation defines a commercial company as one that derives at least 75% of its gross income from goods not manufactured by it or if it is engaged in telecommunication, banking or insurance (other than long-term insurance).	commercial and non-commercial activities, as well as losses incurred in
	Furthermore, the legislation defines "commercial activity" as an activity carried out by a company trading in goods not manufactured by it, and includes an activity of a commission agency, a telecommunications company, a body corporate licensed to carry on banking business in Guyana, and an insurance company carrying on in Guyana insurance business, other than long-term insurance, as defined in section 2 of the Insurance Act.	This creates administrative and financial challenges for affected companies in relation to compliance with the dual rate

Proposed measure	Comments	Impact
Introduction of a flat personal income tax rate or reduction of the existing rates.	The personal income tax rates applied to individuals are: • 28% for chargeable income up to GY\$2,400,000 • 40% for chargeable income in excess of GY\$2,400,000 In comparison to most jurisdictions within CARICOM, the rates are high.	Consideration could be given to introducing a flat rate of tax at a rate lower than the existing rates. The simplification of the tax computation may result in a significant increase in voluntary tax compliance and a widening of the tax base.
Harmonisation of Withholding Tax provisions in the Income Tax and Corporation Tax Acts.	Subject to the criteria set out under the respective Acts, both the Income Tax Act ("ITA") and Corporate Tax Act ("CTA") provide for the imposition of a Withholding Tax on payments made to non-residents. The Withholding Tax rate under the ITA is 20%, while under the CTA is 10%. The specific Withholding Tax provision in the	The absence of clarity may result in an administrative burden to taxpayers and inconsistency in the application of these provisions. Consideration could be given to reviewing and harmonising the respective provisions, with a view of implementing one
	ITA (Section 39) is not incorporated in the CTA, however, in practice it is applied to companies.	non-resident Withholding Tax regime that is applicable to companies and individuals. The simplification of the non-resident Withholding Tax regime may result in an increase in tax compliance and a widening of the tax base.

Proposed measure	Comments	Impact
Tax offset	In practice, the tax authority occasionally offsets taxpayers' tax refunds against outstanding tax liabilities of the taxpayer.	Consideration could be given to providing taxpayers with the option to offset their tax refunds against outstanding tax
	Conversely, this option is not available for taxpayers to select voluntarily.	liabilities.
		The procedure for this arrangement may be developed, and taxpayers advised of the guidelines for accessing this arrangement.
Withholding Tax on interest received on savings	The government previously implemented a partial removal of Withholding Tax on interest income received by individuals on their personal bank accounts.	Consideration could be given to the complete removal of tax on interest income for individuals.
		This will provide an incentive for individuals to save. Additionally, this may also result in increased utilisation of financial institutions for the safekeeping of funds.

Proposed measure

Comments **Impact**

Corporation tax rates 40% and 25%

Harmonisation of Under the current tax legislation, there are differing corporate tax rates for commercial entities (40%) and non-commercial entities (25%). This dual structure complicates compliance and creates potential disputes regarding the characterisation of a company's activities. particularly for businesses with diversified operations. Additionally, the higher rate for commercial activities may deter investment in sectors subject to the higher rate.

A harmonised corporate tax rate would streamline compliance, reducing administrative costs and minimising disputes related to the classification of business activities. By eliminating the disparity in rates, this measure could also attract greater investment across all sectors. particularly in industries subject to the higher commercial rate. It could also improve Guyana's competitiveness as an investment destination, encouraging equitable treatment for businesses and supporting economic growth through increased foreign and domestic investment.

Reform of tax legislative framework around tax appeals and tax dispute process consistent with Caribbean region

Guyana's tax appeals process includes multiple stages with two initial routes: the Board of Review or the High Court. There is no statutory deadline for the Commissioner General to address taxpayer objections, and taxpayers are required to pay a portion or the full amount of the disputed tax before appealing. The absence of a response deadline can significantly prolong disputes and the obligation to pay any tax is cost prohibitive and difficult to refund should the taxpayer be successful.

Modernising the framework in line with international standards could reduce delays and improve efficiency. Lowering financial barriers for appeals would improve fairness and accessibility, while clearer procedures and documentation requirements would ease compliance with the process. Better training for tax officials would improve the quality and accuracy of the tax disputes and build taxpayer confidence.

Proposed measure Harmonisation among Tax legislation, tax administration and Petroleum Agreements

Comments

Guyana's Petroleum Agreements (PA) contain tax concessions, such as, tax exemptions for entities and individuals once certain conditions are met. However, there is a misalignment among the PA provisions, the tax legislation and the GRA practices which creates inefficiencies and may result in unfairness. For example, taxpayers may be required to make upfront tax payments, despite the provisions granting tax relief, and are only eligible for refunds after the GRA conducts an audit verification which is often protracted. This approach diminishes the effectiveness of the intended relief, imposing complicated financial and administrative burdens on taxpayers and complicating compliance efforts. Such inconsistencies may also affect the overall attractiveness of Guyana's investment framework.

Impact

Aligning the legislative framework with the PA provisions ensures that any tax reliefs or exemptions are recognised and given full effect. This reduces the risk of disputes and encourages a more predictable environment for energy companies and subcontractors thereby increasing voluntary compliance and reducing disputes.

Introduction of tax incentives to boost capital markets

Guyana's capital markets remain underdeveloped relative to regional neighbours operating in similar industries. The absence of tax incentives for investments in local equity markets has contributed to limited participation by both institutional and individual investors.

Tax incentives, such as reduced taxes on dividends and capital gains exemptions could stimulate capital market activity. A stronger capital market would support long-term economic growth by improving access to financing for businesses and increasing investor participation resulting in diversification of the economy.



Tax and legal services

Our vision is to build a sustainable and competitive advantage by offering unique, efficient and professional tax solutions to our clients. We believe that in order to maximise client satisfaction, a broad understanding of the tax laws and our client's needs is required.

PwC offers a wide range of tax, corporate secretarial and commercial transaction support services and we utilise subject-matter experts to cater to a variety of clients and their unique needs. This will allow our clients the opportunity to focus on their core competencies in growing their businesses.

Our services extend beyond our borders, as we continue to provide advice to companies operating in Guyana on all of the services outlined as follows.

Tax consulting services

These assignments are all encompassing and include tax advice related to all transactions or issues undertaken as part of the business operations of a client. It extends to cross-border and other tax implications such as tax treaty issues arising on a transaction. Additionally, our experienced team of tax professionals advises on special areas including:

- Corporate finance and funding arrangements
- · Acquisitions and merger tax implications
- · Debt restructuring and debt workouts
- Transfer pricing arrangements and other relevant International tax initiatives impacting cross-border transactions
- · Commodity and financial derivative issues
- · Thin capitalisation rules
- State and Central Government proposals for the introduction of incentives to attract foreign direct investment as well as Regional/Government proposals for reorganisation of taxing authorities.

Compliance services

Corporate Tax returns

Preparation and/or review of tax returns, advising on areas of exposure and recommending solutions for addressing same. Additionally, we can support with review and regularisation of tax records with the Board of Inland Revenue to ensure that the Tax Authority's records are in order.

Value Added Tax returns

Preparation of monthly/bi-monthly Value Added Tax (VAT) returns and associated refund claims if required. Maintenance of a VAT refund monitoring programme for our clients geared towards expediting the receipt or refunds by identifying and clearing up any queries by the Inland Revenue Division on a timely basis.

Quarterly instalments

We support our clients by computing quarterly tax instalments due and payable and where applicable, we make the appropriate applications to the tax authorities for adjustment of these instalments.

Tax and legal services (continued)



Preparation of personal income tax returns for expatriate personnel and advising on all executive and employee compensation and other personal tax matters.

Tax audit and dispute resolution audits/objections/appeals

We provide assistance, advice and support throughout the audit, objections and appeal stages by liaising with the tax authorities on behalf of our clients.

Tax accounting and payroll accounting support

We can assist with the preparation of the relevant tax and payroll accounting documentation.

Corporate Secretarial Services Incorporation

Incorporation of both external and local companies. We provide advice to clients on general corporate matters and concerns.

Amalgamations and other corporate restructurings

Preparation and filing of the necessary documents with the government authorities to effect a required amalgamation or other corporate restructurings. We can also advise on methods of share dispositions and provide the relevant support services for each method including the valuation of shares; drafting of share instruments for review and execution by the company and having same assessed and stamped for duty by the Board of Inland Revenue.

Work permits/renewals and other Immigration related support services

Prepare and submit work permit applications and renewals for expatriate personnel, including facilitating the advertising, interviewing and evaluation process required by the Ministry of National Security. We can also provide support for endorsements, visas and visa waivers and other relevant immigration services.

Liquidation and dissolution

We can assist with, and advise on, voluntary and involuntary winding-ups.

Tax registration

We facilitate the tax, VAT and social security (National Insurance) registrations.

De-registration

We can facilitate the de-registration of both external and local companies from the Companies Registrar and the Tax Authority.

Maintenance of company portfolio

We prepare and file on behalf of the company Annual Returns, filings in relation to corporate changes in corporate instruments as well as other statutory filings and liaise with the Registrar of Companies to address queries relating to corporate documents filed by the company.

Advise and prepare other statutory requirements in accordance with the Company's Act including supporting our clients with the beneficial ownership requirements.

Connect with us



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