

# **FBR** **Quarterly** **Review**

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**A Review of Resource Mobilization Efforts of  
Federal Board of Revenue**



**FEDERAL BOARD OF REVENUE**

*Government of Pakistan*

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# Contents

	<i>Pages</i>
<i>Foreword</i>	<i>iv</i>
I. FBR Tax Collection: An Analysis of July-March, 2011-12	
○ FBR Revenue Position	1
○ Detailed Analysis of Individual Taxes	2
▪ Direct Taxes	2
▪ Indirect Taxes	4
- Sales Tax	4
- Customs Duties	6
- Federal Excise Duties	7
○ Concluding Observations	8
II. Withholding Tax at Import Stage-A Preliminary Assessment	9
III. Industry Profile: Banking Sector in Pakistan	24
IV. Statistical Appendix: July-March, 2011-12	38

## ***Foreword***

*It is encouraging that FBR has attained a significant growth of about 27% in revenue receipts during July-March, 2012 despite low growth in GDP and gas & power outages. The current issue of FBR Quarterly Review provides an update on FBR resource mobilization efforts. The in-depth analysis of tax revenues during July-March 2011-12 presents an insight into various components of federal taxes. Besides tax revenue analysis, the current issue includes two comprehensive articles on “The Banking Sector in Pakistan” and “Withholding Taxes at Import Stage- A Preliminary Assessment”. Both articles provide detailed analysis of tax structure including tax revenue contribution and issues involved. Moreover, month-to-month tax receipts during July-March, 2011-12 as compared to corresponding period last year have also been provided.*

*I appreciate and complement the efforts put in by SP&S Wing, FBR in bringing out this issue. I hope that information provided in the current issue of FBR Quarterly Review will be useful for all readers.*

*Mumtaz Haider Rizvi  
Chairman, FBR*

# I

## FBR Tax Collection:

### An Analysis of the Tax Revenues: July-March, 2011-12

#### FBR Revenue Position

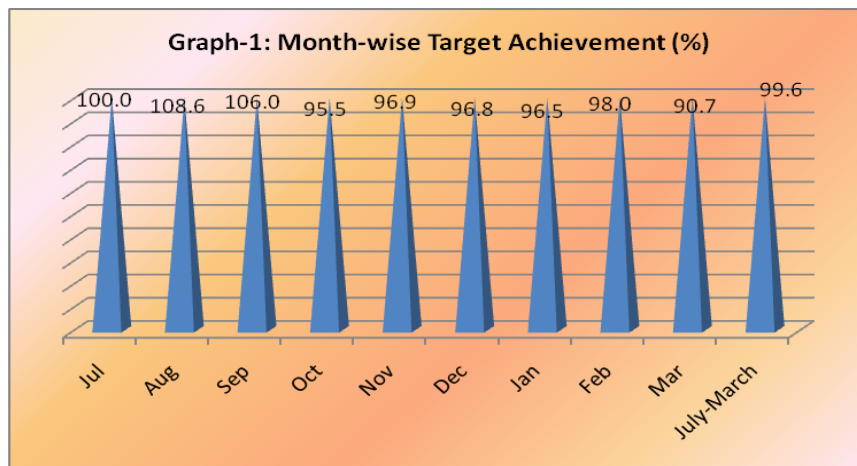
The fiscal year 2011-12 has been quite challenging for FBR as a huge target of Rs.1,952 billion was assigned. In order to reach the target, 25% growth was required over the collection of Rs. 1,558 billion during 2010-11. Despite severe energy crisis and unfavorable economic situation, FBR has been able to attain a significant growth of around 27% during first three quarters of CFY. An amount of Rs. 1,298.8 billion has been collected against Rs. 1,020.1 billion in the corresponding period of PFY. During July-March 2011-12, Rs. 278.6 billion higher amount has been realized as compared to the corresponding period last year. The performance is commendable when viewed in the context of higher refund payments as compared to corresponding period last year. The target has been achieved by around 100% during first 9 months of CFY. The targets of customs and sales tax were exceeded while the target of income tax was missed by only 1.7% during July-March 2011-12. Due to the abolition of special excise duties in Budget 2011-12, the target of FED was achieved to the extent of about 90%.

**Table 1: Head-wise Revenue Collection: July-March 2011-12 Vs 2010-11**  
(Rs. Billion)

Tax Heads	Target	Collection			Target Achieved (%)
		FY 11-12 (*)	FY 10-11	Growth (%)	
Direct taxes	486.8	478.7	381.6	25.4	98.3
Sales Tax	576	586.7	422.7	38.8	101.9
FED	94.5	84.8	89.1	-4.8	89.7
Customs	147.2	148.6	126.8	17.2	101.0
<b>Total</b>	<b>1,304.5</b>	<b>1,298.8</b>	<b>1,020.2</b>	<b>27.3</b>	<b>99.6</b>

(\*)Collection of Sales tax Includes Rs.18.3 billion collected by the Sindh Revenue Board on services.

The month-wise target achievement has been shown in Graph 1. In the months of October to January the performance was not much satisfactory, however, it has started again improving from February 2012 and resultantly the overall target has nearly been achieved.



Keeping in view the growth trend in the first nine months of current year and the collection realized in the 4<sup>th</sup> quarter of PFY, the target of Rs 1,952 billion is expected to be achieved at the end of the current fiscal year.

### Detailed Analysis of Individual Taxes

The tax-wise distribution indicates that except FED, all other taxes have registered a positive growth during first three quarters of CFY. The collection of sales tax have grown by 39%, followed by direct taxes 25.4% and customs duties by 17.2%. The sales tax collection at import stage has witnessed a highly impressive growth of 47.6%.

**Direct Taxes:** The performance of direct taxes during first and second quarter remained excellent; however, in third quarter the pace of growth remained slow. The collection increased by 30.1% and 29.5% in 1<sup>st</sup> and 2<sup>nd</sup> quarters respectively (Table 2). In Q3, the growth momentum could not continue and the net collection grew by 18% as compared to Q3 of PFY. Nevertheless, it is encouraging to note that overall growth in first nine months have been 25.4%. In absolute terms, Rs. 478.7 billion have been collected against the target of Rs.486.8 billion and target has been achieved to the extent of 98.3%. In next three months of CFY, a balance of Rs. 266 billion would require to be collected. Keeping in view the growth trend of first nine months, it is hoped that the target of direct taxes would be met.

**Table 2: Net Revenue Receipts of Direct Taxes: A Comparison**  
(Rs. Billion)

Period	Net Collection		Growth (%)
	FY 11-12	FY 10-11	
Quarter-I	124.5	95.7	30.1
Quarter-II	188	145.2	29.5
<b>H1: July-Dec.</b>	<b>312.5</b>	<b>240.9</b>	<b>29.7</b>
Quarter III	166.1	140.7	18.0
<b>July-March</b>	<b>478.6</b>	<b>381.6</b>	<b>25.4</b>

### ***Analysis of Components of Direct Taxes***

The components of direct taxes are income & corporate tax and other direct taxes. The former broadly consists of Collection on Demand (COD), Voluntary Payments (VP) in the shape of tax with returns, advance tax and withholding taxes (WHT). The other direct taxes include WWF and WPPF which accounts for about 2% of net collection. Table 3 highlights the performance of these heads during CFY.

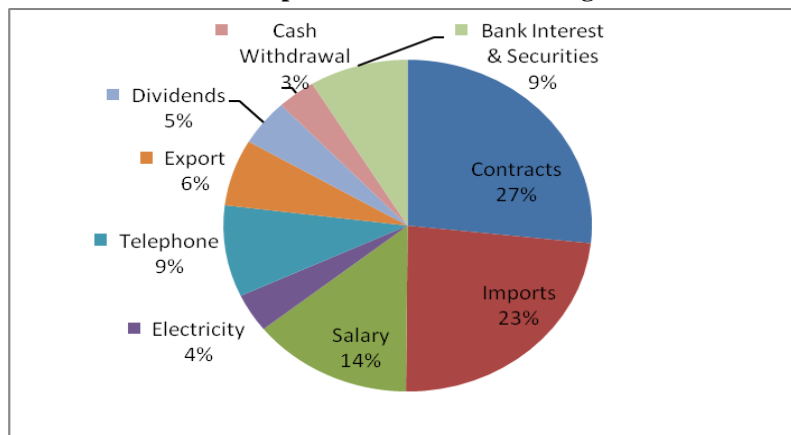
**Table 3: Direct Taxes Collection July-March**

(Rs. Million)

Revenue Heads	FY 11-12	FY 10-11	Growth (%)
<b>Collection on Demand</b>	<b>73,363</b>	<b>34,268</b>	<b>114.1</b>
Arrear	6,009	12,644	-52.5
Current	67,354	21,624	211.5
<b>Voluntary payment</b>	<b>161,552</b>	<b>128,407</b>	<b>25.8</b>
With Returns	13,257	11,123	19.2
Advance Tax	148,295	117,284	26.4
<b><u>Withholding Tax</u></b>	<b>286,398</b>	<b>235,758</b>	<b>21.5</b>
Misc	23,324	1,685	1284.2
Total Income Tax (Gross)	544,637	400,118	36.1
Refund	76,151	29,458	158.5
Income Tax (Net)	468,486	370,660	26.4
Other Direct Taxes	10,176	10,959	-7.1
<b>Total Direct Taxes (Net)</b>	<b>478,662</b>	<b>381,619</b>	<b>25.4</b>

The collections under the voluntary compliance and COD have grown by 25.8% and 114% during July-March 2011-12. WHT continues to be the leading source of direct tax receipts. The WHT collection during July-March, 2011-12 has been Rs. 286.4 billion against Rs. 235.8 billion during PFY, indicating a healthy growth of 21.5%. The major contributors of withholding taxes are contracts, imports, salary, telephone, export, bank interest, electricity, dividends and cash withdrawal as given in Table 4. The share of contracts (27%) remains at the top followed by imports (24%), salary (14%), and telephones 9% (Graph 2).

**Graph-2: Share of Withholding Taxes**





The highest growth in WHT collection has been from dividends (56.3%) followed by imports (38.9%), bank interest (37.1%) and salaries (23.6%).

**Table 4: Collection from Leading WHT Heads**

(Rs Million)

Collection Head	July- March		Difference	
	FY 11-12	FY 10-11	Absolute	Percent
Contracts	70547	60931	9616	15.8
Imports	61985	44629	17356	38.9
Salary	37431	30290	7141	23.6
Electricity	9921	10763	-842	-7.8
Telephone	23512	19374	4138	21.4
Export	17082	16598	484	2.9
Dividends	11925	7632	4293	56.3
Cash Withdrawal	8923	10484	-1561	-14.9
Bank Interest & Securities	22959	16741	6218	37.1
<b>a. Sub Total</b>	<b>264,285</b>	<b>217,442</b>	<b>46,843</b>	<b>21.5</b>
% Share in total WHT	92	90		
b. Other WHT	22,113	18,316	3,797	20.7
<b>c. Total WHT</b>	<b>286,398</b>	<b>235,758</b>	<b>25618</b>	<b>21.5</b>
Share (%) in Gross I. Tax	53	59		

#### ***Detailed Analysis of Indirect Taxes***

The indirect taxes are comprised of three components: sales tax (GST), federal excise duties, and customs duties. The major contribution in indirect taxes is made by sales tax followed customs and federal excise duties.

**Sales Tax:** Sales Tax is the leading sources of federal tax receipts. It has contributed around 45.3% of the total net revenue collection of federal taxes during the first nine months of FY: 11-12. The net collection has been Rs. 586.7 billion, respectively showing growth of 39% over the corresponding period of PFY. The target has been exceeded by 2%. The net collection of sales tax has grown by more than 30% in each quarters of CFY as compared to corresponding period last year.

**Table 5: Sales Tax Collection:  
A Comparison: July-March 2011-12 Vs 2010-11**

(Rs .Billion)

Period	Net Collection		Growth (%)
	FY: 11-12	FY:10-11	
<b>July-March</b>	<b>586.7</b>	<b>422.7</b>	<b>38.8</b>

### ***Sales Tax (Domestic) Collection and Major Revenue Spinners:***

The commodity-wise details of domestic sales tax collection during July-March 2011-12 confirms that a significant growth has been witnessed in sugar (130.3%) followed by cement (82.2%), natural gas (19.5%) and POL products by 11.4%. The collection of sales tax is skewed towards few items and only major ten items shared 73% in gross collection. A negative growth has been recorded in GST receipts from services and electrical energy during the period under review. The negative growth in services is mainly due to collection of services started by the Government of Sindh as well. As far as decline in the collection of electrical energy is concerned, higher refunds payments as well as higher input/output ratios as compared to previous year have affected its collection during July-March, 2011-12.

### ***Sales Tax at Import Stage:***

The contribution of sales tax at import stage has been around 53% in total sales tax collection during July-March 2011-12. The growth in each quarter and overall collection has been encouraging. In Q1, Q2 and Q3, STM collection grew by 62.8%, 37.6% and 50.7% respectively.

Commodity-wise details reveal that top ten major commodities have recorded a double-digit growth in collection. These items include POL products, edible oil, plastic, vehicles, machinery, fertilizers, iron & steel etc. (Table 6). Further, around 35% of sales tax collection originates from POL products.

**Table 6: Major Revenue Spinners of Sales Tax at Import Stage**

*(Rs. Million)*

PCT	Tariff Description	ST (M) Collection			Share (%) JM: 11-12
		JM: 11-12	JM: 10-11	Growth (%)	
27	POL Products	109,839	75,127	46	35
15	Edible oil and Waxes	24,858	19,862	25	8
39	Plastic	20,095	18,014	12	6
87	Vehicles	19,531	14,187	38	6
84	Machinery	17,304	6,641	161	6
31	Fertilisers	16,149	826	1,855	5
72	Iron & Steel	15,612	13,770	13	5
85	Electrical Machinery	10,525	6,077	73	3
12	Oil Seeds	8,083	5,357	51	3
29	Organic Chemicals	6,832	5,648	21	2
	Sub-total	<b>248,828</b>	<b>165,509</b>	<b>50</b>	<b>80</b>
	Others	63,382	46,515	36	20
	<b>Grand Total:</b>	<b>312,210</b>	<b>212,024</b>	<b>47.6</b>	
	Refunds	5	44	-89	
	Net	<b>312,900</b>	<b>211,980</b>	<b>47.6</b>	

*Note: JM stands for July-March*

**Customs Duties:** Despite broad-based tariff rationalization over the years, the customs duty is still one of the important sources of tax collection in the country. The share of customs duties in indirect taxes and total federal taxes has been around 19% and 12% respectively. An amount of Rs. 148.6 billion as collection has been realized during July-March, 2011-12 against Rs. 126.8 billion in PFY. The collection is 17.2% higher than the collection of last year and the target has been exceeded by 0.9%.

The commodity-wise information presented in Table 7 reveals that the collection lacks diversification as only fifteen commodities contribute a major share in total gross receipts. Auto sector is a vital source of customs duties. The collection from automobile has improved by 45% mainly due to 21% growth in dutiable imports.

POL products classified in chapter (27) have exhibited a growth of about 11% in collection of customs duties. Other items like edible oil, machinery, plastic, iron & steel and textile materials have registered positive growth in the collection due to increased dutiable imports. However, the collection from paper & paperboard and tea & coffee has registered a negative growth of 8.5% and 3% due to decline in dutiable imports during the same period.

**Table 7: Growth in Collection of Customs Duties and Effective Rates  
During FY: 2011-12 and FY: 2010-11**

*(Growth and Effective Rates in percent)*

<b>PCT Chapter</b>	<b>Tariff Description</b>	<b>Growth During July-March (%)</b>			<b>Effective Rates with Dutiable Imports</b>	
		<b>Value of Imports</b>	<b>Dutiable Imports</b>	<b>Customs Duties</b>	<b>Upto March, 2011-12</b>	<b>Upto March, 2010-11</b>
87	Vehicles	30.0	20.8	45.4	33.6	27.9
27	POL Products	40.2	-3.8	11.3	9.1	7.9
15	Edible oil and Waxes	23.9	24.4	5.5	8.2	9.7
84	Machinery	3.1	4.4	6.9	7.8	7.6
85	Electrical Machinery	6.8	13.2	8.5	8.0	8.4
39	Plastic Resins, etc.	2.3	2.8	3.3	7.4	7.3
72	Iron & Steel	11.0	6.1	3.9	11.2	11.4
48	Paper and Paperboard	0.3	-2.1	-8.5	17.0	18.2
54	Textile Materials	6.5	6.6	5.1	9.0	9.1
29	Organic chemicals	19.8	2.0	5.4	6.1	5.9
9	Coffee and Tea etc.	0.2	-1.0	-3.0	9.7	9.9
55	Staple Fibres	7.2	5.9	11.0	6.3	6.0
4	Dairy Produce; Birds' Eggs; Natural Honey	-1.0	-2.1	-5.0	24.9	25.7
32	Dyes & paints .	-1.1	-4.3	-6.1	11.8	12.0
69	Ceramic Products	38.7	39.5	30.4	28.5	30.5
	Others	6.5	14.5	31.4	22.8	21.1
	<b>Grand Total:</b>	<b>18.3</b>	<b>8.8</b>	<b>16.8</b>	<b>13.3</b>	<b>12.4</b>

**Federal Excise:** The collection from federal excise duties has registered a negative growth of 4.8% during July-March: 2011-12. The net revenue stood at Rs.84.8 billion against Rs.89.1 billion during the corresponding period last year. One of the major reasons of this decline is the abolition of special excise duty on imports and domestic stages.

The commodity-wise collection of major revenue spinners provides a comparison between JM: 11-12 against JM: 10-11 (Table 8). The share of six major items has been around 85% during this period. The collection from cigarettes exhibited a growth of 15.5% followed by POL products (11.4%) and natural gas (2%) respectively. The collection from cement, services and beverages have registered negative growth. The decline in collection from cement and beverages is due to the reduction of FED rates announced in Budget FY: 2011-12.

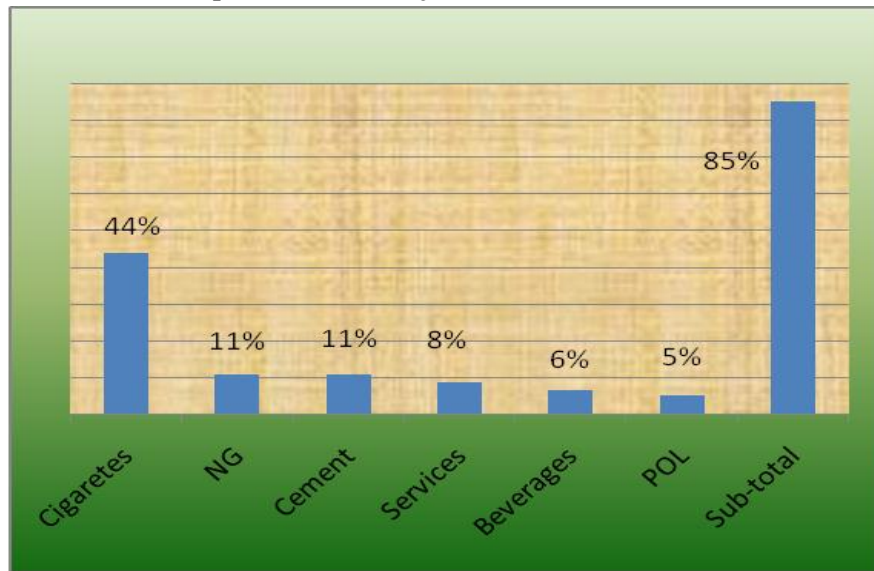
**Table 8: FED Collection from Major Commodities  
July-March: 2011-12 Vs 2010-11**

*(Rs. Million)*

Commodities	FY 11-12	FY 10-11	Difference	
			Absolute	Percent
Cigarettes	35,945	31,123	4,822	15.5
Cement	8,871	10,739	- 1,868	-17.4
Natural Gas	8,821	8,652	169	2.0
Services	7,027	8,424	-1397	-16.6
Beverages	5,248	5,919	-671	-11.3
POL	4,171	3,743	428	11.4
Sub Total	70,083	68,600	1483	2.2
Other	12,447	20,488	-8041	-39.2
<b>Total</b>	<b>82,530</b>	<b>89,088</b>	<b>-6558</b>	<b>-7.4</b>

The six revenue spinners of FED that have contributed major part of FED are cigarettes, cement, beverages, natural gas, POL products and services (Graph 3). The combined share of these six items has been 85% during July-March 2011-12. The major amount is contributed by one item i.e. cigarettes Rs. 36 billion out of Rs. 82.5 billion FED collection in July-March 2011-12.

**Graph-3: Share of Major items in FED Collection**



### **Concluding Observations**

The current fiscal year has been quite challenging. On one hand, a huge target of Rs.1,952 billion was assigned and on the other hand, gas & power outages and overall economic slowdown has affected the collection of federal taxes. Despite all these factors hindering growth in the tax revenues, it is encouraging that all the major taxes exhibited substantial growth during July-March 2011-12. With dedication and hard work, it is hoped that the target of Rs.1,952 billion will be achieved.

## II

### **Withholding Tax at Import Stage-A Preliminary Assessment**

**By**

**Mir Ahmad Khan<sup>1</sup>**

#### **Introduction**

Imports have been one of the vital sources of tax revenues in developing countries. The empirical findings of Li and Murphy (2010) reveal that changes in imports drive changes in tax revenues Pakistan relied rather heavily on duty and taxes on import for revenues in the absence of any meaningful contribution by the domestic sector. The purpose of the existing policy was to apply higher tariff to generate sufficient revenues on one hand and to protect local industries that were at their infancy stage on the other hand. It is easier to collect taxes on imports and rather sure source of revenue generation if smooth inflow of imports continues.

Despite large scales tariff rationalization in a couple of decades, a significant amount of duties and taxes are still collected from imports. Apart from tariff, imports have been subjected to para tariff<sup>2</sup> and other import taxes like sales tax, federal excise duty and withholding income tax. Withholding tax on imports was introduced to enhance the level of contribution of withholding taxes despite its protective effects. It has exhibited significant improvement in the tax receipts in the recent years and is the third major source of import related taxes. On the direct taxes front, withholding tax on imports is the second major revenue generation source of overall withholding taxes.

The main purpose of present article is to assess and improve the rate structure & eliminate exemptions, and to determine the level of contribution by withholding taxes on imports by various sectors. The article will, especially, be helpful for locating of tax measures for improving revenues. Starting from a brief introduction, an analysis of tax rate structure has been presented followed by analysis of withholding tax revenues from imports. After that some issues of WHT on imports have been discussed and finally, the discussion concluded.

#### **Legal Aspects of Withholding Tax on Imports**

The withholding tax on import was introduced in 1979<sup>3</sup> through section 50(5) of the Income Tax Ordinance, 1979. However, it was incorporated in the Income Tax Ordinance,

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<sup>1</sup>Author is the Second Secretary, Strategic Planning, and Research & Statistics Wing, FBR. The Author is highly grateful to Madam Azra Mujtaba, Member(SP&S), FBR for invaluable support and guidance for completion of this article. Thanks are also due to Muhammad Ashraf Ghauri, (DR&S), Saghir Ahmed, SP&S Wing and Syed Shoaib Iqbal (DR&S) for providing data support.

<sup>2</sup>Para tariff is the levy of surcharges.

<sup>3</sup>See for details on withholding tax "Guide to Withholding Tax", Federal Board of Revenue,( April, 1999).

2001 under section 148. The collection of withholding tax on imports is the responsibility of Customs authorities. The person responsible for collection is Collector of Customs. The withholding tax on import is collected at 13 Model Customs Collectorates all over the country. The tax base of withholding tax on import is the value of goods as per section 25 of Customs Act, 1969, subject to the *ad valorem* duty increased by the customs-duty, sales tax and federal excise duty, if any, payable.

## **Structure of Withholding Tax Rates on Import Stage**

### ***A. Standard Withholding Tax Rate***

The withholding tax on import has largely been fluctuating between 2% to 6% during 1990-91 to 2011-12 as is evident from the Table 1.

**Table 1: Trends in Withholding Tax Rates on Imports**

<b>Fiscal Years</b>	<b>Withholding Tax Rates</b>
1991-92	2%
1994-95	2%
1995-96	4%
1999-2000	5%
2001-02	6%
2006-07	6%
2007-08	5%
2008-09	2%
2009-10	4%
2010-11	5%
2011-12	5%

### ***B. Reduced Withholding Tax Rates***

Apart from the standard rate of 5%, reduced rates of withholding tax i.e. 3%, 2% and 1% are applicable in various categories as discussed below:

#### ***i) Reduced Withholding Tax @3% for Import of Raw Material for Industrial Undertakings<sup>4</sup>***

According to the clause (9A) of the part II of the second schedule, withholding tax@3% on value of the raw material imported by an industrial undertaking is allowed for its own use.

<sup>4</sup> Detailed definition of Industrial Undertaking has been provided in Chapter 1 under (Preliminary) of Income Tax Ordinance, 2001 available at [www.fbr.gov.pk](http://www.fbr.gov.pk).

The withholding tax rates on imports for manufacturing sector from 2006-07 to 2011-12 are depicted in Table 2:

**Table 2: Reduced Tax Rates for Industrial Undertakings**

<b>Fiscal Years</b>	<b>Raw Materials Imports by Industry</b>
2006-07	6%
2007-08	1%
2008-09	2%
2009-10	3%
2010-11	3%
2011-12	3%

Currently, the reduced rate of 3% for the industrial undertakings is adjustable while tax collected from a person on imports of edible oil and packing materials for a tax year is minimum tax.

*ii) Reduced Withholding Tax @2% for Import of Pulses*

As provided in clause 24 of part II of the 2<sup>nd</sup> Schedule to the Income Tax Ordinance, 2001, a reduced withholding tax rate of 2% is allowed to the imports of pulses.

*iii) Reduced Withholding Tax @1% on Imports*

The reduced rate of withholding tax i.e. 1% is applied to a number of items or groups of items through various clauses of second Schedule to Income Tax Ordinance, 2001. The detail has been depicted in Table 3.

**Table 3: Reduced Withholding Tax @1% on Imports**

<b>Description</b>	<b>HS code/ PCT</b>	<b>SROs/Clauses of Part II of the 2<sup>nd</sup> Schedule</b>	<b>Adjustable /Final</b>
Potassic Fertilizer	3104	Economic Co-ordination Committee (ECC) decision No. ECC-155/12/2004[Clause 13E Part]	<b>Final</b>
Mobile Phone Sets	8517.1210	Clause 13G	<b>Final</b>
Gold	3102.1000	Clause 13G	<b>Final</b>
Silver	Respective Heading	Clause 13G	<b>Final</b>
Export Oriented Industries	Chapter 50 to 63 of Pakistan Customs Tariff and their inputs	Clause 9	<b>Final</b>
Urea Fertilizer	3102.1000	Clause 23	<b>Final</b>



## **Further Exemptions From Withholding Tax on Imports**

Apart from various reduced rates of withholding tax at import stage, a number of exemptions from WHT on imports have also been allowed. An effort has been made to group these exemptions as follows:

### **1) Petroleum Products**

According to clause 56(i) of Part (IV) of the 2<sup>nd</sup> schedule to the Income Tax Ordinance, 2001, the whole Pakistan Customs Tariff (PCT) Chapter (27), mainly covering petroleum products i.e. energy items crude oil, motor spirit, furnace oil, high speed diesel oil etc & non energy items etc. are exempt from withholding tax on imports.

### **2) Power/Energy Sector**

The exemptions for imports from withholding tax for the power are highlighted below:

- i) As per Clause (76) of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001, exemption from WHT is allowed to import of solar PV Panels/modules, along with related components including inverters, charge controllers and batteries, LVD induction lamps, SMD, LED's with or without ballast with fittings and fixtures, fully assembled solar torches, lanterns and related instruments.
- ii) Further, exemption was also allowed to import of goods dedicated for use in renewable sources of energy like solar and wind etc., even if locally manufactured, which include induction lamps, SMD LED's with or without ballast with fittings and fixtures, wind turbines including alternator and mast, solar torches, lanterns and related instruments, PV modules along with the related components including inverters, charge controllers and batteries through Clause (77) of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.
- iii) The imports by Contractors and sub contractors engaged in the execution of power project under the agreement between the Islamic Republic of Pakistan and HUB Power Company Limited are also exempt covered by Clause (70) of Part IV of 2<sup>nd</sup> Schedule

### **3) Automobile**

- i) Tax shall not exceed the amount specified in Notification No. SRO 577(I)/2005 dated 6<sup>th</sup> June, 2005 and Clause 4 of Part III of 2<sup>nd</sup> Schedule to the Income Tax Ordinance, 2001.
- ii) Exemption has also been granted to imports under PCT(Chapter 86) i.e. railway or tramway locomotive rolling-stock and parts thereof; railway or tramway fixtures and fitting and parts thereof mechanical (including electromechanical traffic

signals equipment of all kinds through Clause 56(i) of Part IV of the 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

#### **4) Trading Houses**

Imports of the trading houses are exempt under Clause 57 of Part IV of 2<sup>nd</sup> Schedule under the following conditions.

- i) Have paid up capital of exceeding Rs.250 million
- ii) Own fixed assets exceeding Rs. 300 million at the close of the Tax year.
- iii) Maintain computerized records of imports and sales of goods.
- iv) Maintain a system for issuance of 100% cash receipts on sales.
- v) Present accounts for tax audit every year and is registered with Sales Tax department

#### **5) Exportation/Exporters**

The exemption of imports is also allowed to the followings:

- i) Goods imported by direct and indirect exporters covered under sub-chapter 7 of Chapter XII of SRO 450(I)/2001 dated June 18, 2001.
- ii) Goods temporarily imported into Pakistan for subsequent exportation and which are exempt from customs duty and sales tax under Notification No. S.R.O.1065 (I)/2005 dated the 20<sup>th</sup> October, 2005 and Clause 56 of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

#### **6) Manufacturing Bonds**

Imports by Manufacturing Bond as prescribed under Chapter XV of Customs Rules, 2001 notified vide SRO.450(I)/2001, dated June, 18, 2001 are exempted as per Clause 56(iii) of Part IV of 2<sup>nd</sup> Schedule to the Income Tax Ordinance, 2001

#### **7) Plant Machinery, Fixtures, Fitting etc for Promotion of Industrial Activities**

Exemption of imports is provided through SRO 947(I) 2008 dated September 05, 2008 in case of plant, machinery, fixtures, fittings or its allied equipments for the purposes of setting up an industrial undertaking (including hotels) or for installation of an existing industrial undertaking (including hotels) by the same industrial undertaking and a certificate to that effect from the Commissioner, in respect of such plant, machinery, fixtures, fittings or equipments is produced certain conditions and restrictions apply on the issuance of the certificate by the Commissioner).

## **8) Relief for Affected Areas**

### *i) Import of Machinery*

Import of plant and machinery for establishment of business in the most affected and moderately affected areas of Khyber Pukhtunkhwa, FATA and PATA till the 30<sup>th</sup> day of June, 2011 is exempt through Clause 10A(iv) of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

### *ii) Import of Raw Materials*

Exemption is also provided through SRO 754/(I)/2010 dated August 9,2010 to raw materials imported for own consumption by the taxpayers (other than the manufacturers and suppliers of cement, sugar, beverages and cigarettes) located in the most affected areas of Khyber Pakhtunkhwa, (district Peshawar, Malakand Agency, and districts of Swat, Buner, Shangla, Upper Dir, Lower Dir, Hangu, Bannu, Tank, Kohat, and Chitral) and taxpayers located in moderately affected areas of Khyber Pakhtunkhwa (Charsada, Nowshera, D.I. Khan Batagram, Lakki Marwat, Swabi and Mardan), FATA and PATA on production of exemption certificate issued by the Chief Commissioner concerned.

## **9) Pesticide**

Exemption from withholding tax is allowed to mineral oil imported by a manufacturer or formulator of pesticides which is exempt from customs-duties under the customs Notification No. SRO 857(I)/2008, dated the 16<sup>th</sup> August, 2008 under Clause (56)(v) of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

## **10) Cypher Devices**

The exemption of withholding on import is also allowed to fully as well partly designed/assembled cipher devices, for use within the country as are verified by Cabinet Division (NTISB) with reference to design, quality and quantity according to Clause (60) of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

## **11) Special Provisions**

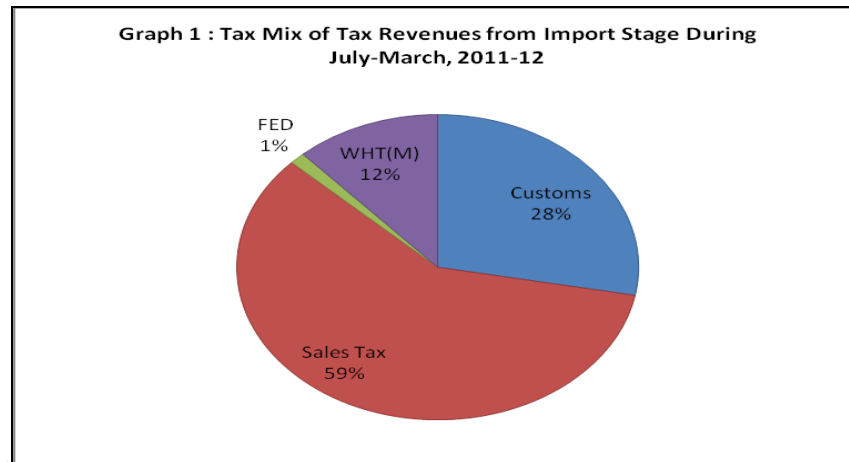
Pakistan Customs Tariff Chapter (99) covering exempted items from customs duty including the imports of diplomats, foreign missions etc. through Clause 56 of Part-IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

## **12) Agha Khan Development Networks**

Institution of Agha Khan Development Network, Pakistan listed in Schedule 1 of the Accord and Protocol dated November 13, 1994, executed between the Government and Agha Khan Network through Clause 16 of Part IV of 2<sup>nd</sup> Schedule to Income Tax Ordinance, 2001.

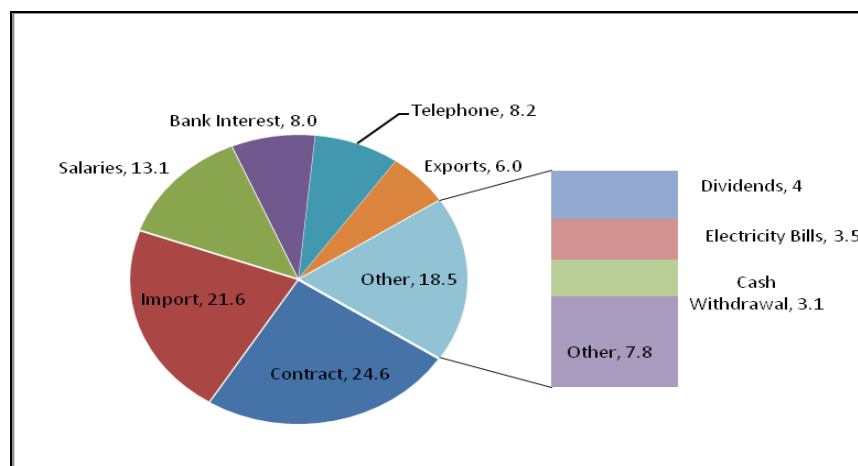
## Contribution of Withholding Tax in Tax Revenue from Imports

The overall collection of tax receipts at import stage constitutes a significant portion of the federal taxes in Pakistan. Withholding tax is the 3<sup>rd</sup> major revenue generation source of the import related taxes which also contributes more than 1/5<sup>th</sup> to the overall collection from imports as evident from Graph 1. During July-March 2011-12, a significant amount of Rs.62 billion was realized against Rs. 44.6 billion during corresponding period last year.



Withholding taxes are the leading revenue generation source of income tax in the country. Withholding tax on import stage is one of the components of overall withholding taxes. It is the second top revenue generation source of withholding taxes after contracts. In fact, it has contributed more than 2/5<sup>th</sup> of the collection of withholding taxes during July-March, 2011-12 as illustrated in Graph 2.

**Graph 2: Composition of Withholding Taxes(%) during July-March, 2011-12**



The withholding tax on imports has cast healthy influence on the receipts of overall withholding taxes and import related taxes in the recent years. A major breakthrough has been observed in 2009-10 when its receipts have manifested a dramatic rise from Rs. 30 billion to Rs. 50 billion entailing a massive growth of 67%. Consequently, it stood at Rs. 66 billion in 2010-11 with 32% growth. Similarly, the spate of higher growth continued during the July-March in the current fiscal year as well.

Year wise details of tax revenues realized from imports, overall withholding tax and WHT on imports have been presented in Table 4.

**Table 4: Tax-wise Trends in Tax Receipts**

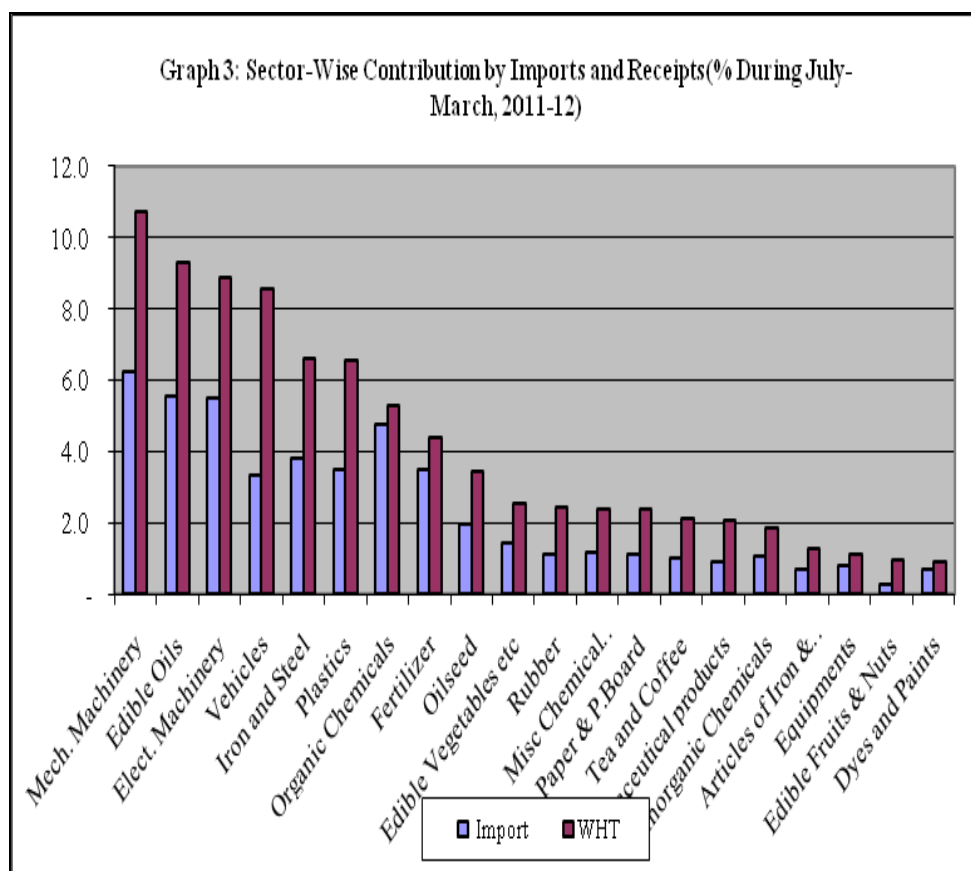
(Rs Billion)

<b>Fiscal Year</b>	<b>All Taxes Collected from Imports</b>	<b>Overall Withholding taxes</b>	<b>WHT on Import</b>
1990-91	60.4	50.5	2.1
1991-92	74.8	61.8	3.0
1992-93	77.2	61.4	3.6
1993-94	83.1	64.2	3.8
1994-95	106.5	77.7	4.2
1995-96	129.3	88.9	10.9
1996-97	136.5	86.1	12.6
1997-98	118.7	74.5	12.0
1998-99	125.2	65.3	14.1
1999-00	149.0	61.7	14.7
2000-01	179.9	65.0	19.4
2001-02	167.4	47.8	19.2
2002-03	202.6	68.8	20.8
2003-04	247.9	91.0	22.8
2004-05	296.0	115.4	24.5
2005-06	350.6	138.4	26.9
2006-07	349.8	132.3	25.8
2007-08	400.2	150.7	27.7
2008-09	411.0	148.4	30.1
2009-10	488.2	160.3	50.2
2010-11	579.4	184.9	66.4

Source: FBR Data Bank

It is evident from Graph 3 that sector-wise contribution in imports and receipts reflect a strange picture during July-March, 2011-12. All the 20 major revenue spinners of withholding taxes reflect higher contribution in withholding tax as compared to the their contribution in imports. These major 20 items covers only around 48% of the total imports while contribution in withholding tax has been around 84%. This implies that remaining around half of imports contributed around 16% of the withholding tax. This is a clear

indication of how huge is the level of exemptions in withholding tax at import stage. This further confirmed by the fact that petroleum oils (Chapter 27) contributed 28.7% of the imports but exempted from withholding tax.



### ***Tax Collection Rate<sup>5</sup>***

An effort has been made to gauge that which sector is facing higher rate of withholding tax on import. It is evident from Table 5 that collection rate during July-March; 2011-12 have been higher in case of edible fruits (7.3%)<sup>6</sup>, vehicles (5.4%), pharmaceuticals (5%) etc. Similarly, organic chemicals, fertilizer, equipments machinery, iron & steel etc have relatively low collection rate. The low collection rate of 0.7% has been recorded in items of import other than 20 major spinners of withholding tax on imports.

<sup>5</sup>Collection rate is simply the receipts of withholding tax on imports relative to imports.

<sup>6</sup>This is strange case as this collection rate is extremely higher than standard rate. The piecemeal information of PCT Chapter 8 reflects higher collection rates in case of dried grapes (0806.2000), (ii) apples (0808.1000) and (iii) Apricot 0809.1000.

**Table 5: Sector-Wise Tax Collection Rates of WHTon Imports  
during July-March, 2011-12**

*(Rs Billion)*

SNO	Sectors	Imports	WHT Tax	Tax Collection Rate (%)
1	Mechanical Machinery	183,314	6,639	3.6
2	Edible Oils	163,447	5,762	3.5
3	Electrical Machinery	162,103	5,506	3.4
4	Vehicles	97,899	5,304	5.4
5	Iron and Steel	112,568	4,108	3.6
6	Plastics	102,599	4,076	4.0
7	Organic Chemicals	139,873	3,265	2.3
8	Fertilizer	102,883	2,727	2.7
9	Oilseed	58,268	2,142	3.7
10	Edible Vegetables etc	42,632	1,561	3.7
11	Rubber	32,663	1,495	4.6
12	Misc Chemical Products	34,331	1,482	4.3
13	Paper & Paper Board	32,354	1,467	4.5
14	Tea and Coffee	29,529	1,309	4.4
15	Pharmaceutical products	26,005	1,293	5.0
16	Inorganic Chemicals	31,078	1,136	3.7
17	Articles of Iron & Steel	20,034	774	3.9
18	Equipments	22,620	687	3.0
19	Edible Fruits & Nuts	8,252	599	7.3
20	Dyes and Paints	20,115	563	2.8
	Sub Total	1,422,567	51,895	3.6
	Other	1,519,584	10,105	0.7
	Total	<b>2,942,151</b>	<b>62,000</b>	2.1

It is clear from Table 6 that all the top 20 sectors recorded improvement in their receipts from 2007-08 to 2010-11. The improvement has been remarkable in 2011-12 as well. The collection grew by 38.2% which is a good omen for revenue generation at faster pace. Out of the twenty major spinners, only paper & paperboard has exhibited negative growth which is mainly due to reduced import during July-March, 2011-12.

**Table 6: Trends in Receipts of Major Spinners of WHTon Imports***(Rs Million)*

PCT Ch.	Description	2007-08	2008-09	2009-10	2010-11	2011-12 Upto March	2010-11 Upto March	Growth (%)
<b>84</b>	Mechanical Machinery		2,966	4,179	6,177	6,639	3,580	85.4
<b>15</b>	Edible Oil	2,818	3,123	4,825	7,033	5,762	4,806	19.9
<b>85</b>	Electrical Machinery	2,797	2,270	3,447	5,560	5,506	3,505	57.1
<b>87</b>	Vehicles (Non-Railway)	2,370	1,791	4,520	5,209	5,304	3,715	42.7
<b>72</b>	Iron and Steel	2,401	2,523	4,340	5,060	4,108	3,642	12.8
<b>39</b>	Plastic Resins etc.	1,572	2,046	3,824	5,082	4,076	3,658	11.4
<b>29</b>	Organic Chemicals	1,346	1,887	3,146	3,930	3,265	2,702	20.8
<b>31</b>	Fertilisers	583	697	2,087	1,388	2,727	1,077	153.1
<b>12</b>	Oilseeds	426	657	1,745	1,748	2,142	1,451	47.6
<b>07</b>	Edible Vegetables etc	265	598	773	1,284	1,561	1,076	45.0
<b>40</b>	Rubber Products	584	432	1,013	1,793	1,495	1,251	19.5
<b>38</b>	Misc Chemical Product	567	667	1,376	1,899	1,482	1,280	15.8
<b>48</b>	Paper & Paperboard	790	794	1,302	2,170	1,467	1,583	-7.4
<b>09</b>	Tea & Coffee	410	562	1,170	1,687	1,309	1,299	0.8
<b>30</b>	Pharmaceutical Product	677	545	1,316	1,548	1,293	1,123	15.2
<b>28</b>	Inorganic Chemicals	271	735	968	1,266	1,136	831	36.8
<b>73</b>	Articles of Iron & Steel	457	450	643	854	774	571	35.7
<b>90</b>	Optical, Photographic	351	276	471	764	687	433	58.
<b>08</b>	Edible Fruits & Nuts	206	216	502	684	599	521	15.0
<b>32</b>	Dyes and Paints	278	345	554	735	563	506	11.4
	<b>Sub Total</b>	<b>21,398</b>	<b>23,581</b>	<b>42,199</b>	<b>55,869</b>	<b>51,894</b>	<b>38,609</b>	34.4
	<b>Others</b>	<b>6,277</b>	<b>6,521</b>	<b>8,054</b>	<b>10,530</b>	<b>9,791</b>	<b>6,020</b>	62.6
	<b>Grand Total</b>	<b>27,675</b>	<b>30,102</b>	<b>50,253</b>	<b>66,399</b>	<b>61,685</b>	<b>44,629</b>	38.2

## Issues in Withholding Tax on Imports

### *Concentration of Revenues and Narrowness of Base*

A bulk of withholding tax at import stage is collected from major 20 PCT Chapters. Most of these chapters are traditionally the major revenue spinners of either customs or sales tax on import. There is a need to bring the other sectors in the net or to shoulder the burden

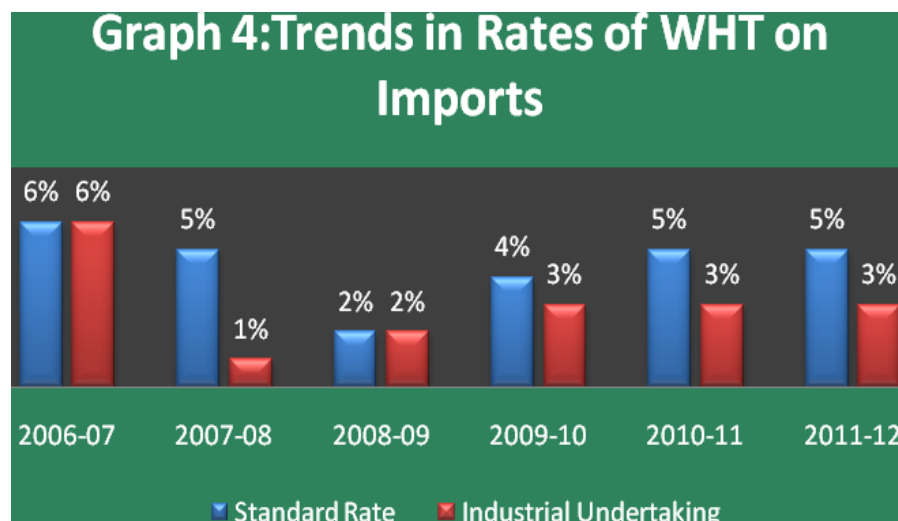


equally and help in enhancement of tax receipts. The substantial contribution is also required from remaining PCT chapters as well.

The narrowness of the base of withholding tax on import stage is the leading issue in withholding tax on imports. Around half of the import is either lightly taxed or out the tax net. Some sectors require preferential treatment for investment and industrial growth purposes. On the other hand, we have to honor the contracts with international organizations, diplomats etc. Many exemptions already mentioned in the exemption section seem unjustifiable.

#### ***Instability and complexity in Rates Structure***

There have been wide fluctuations in the standard rate of withholding tax on import in the last 6 years. Similar is the case of import of raw material by industrial undertakings for their own use to some extent. Graph 4 illustrates variations in the withholding tax rate on imports.



The application of uniform withholding tax on imports is a debatable issue. A uniform withholding tax rate is highly attractive in a variety of ways. This will lessen the cost of the importers. The advantage of uniform rate will be to limit the role of the special interest groups who exert pressure on the government for concessions or reduction of rates. Moreover, Roberta Gatti, World Bank shows a robust association between standard deviation of tariff and measured corruption across countries.

It is evident from graph 4 that a uniform rate of 2% was applicable to commercial and industrial importers in 2008-09 with minor exceptions. Despite lower uniform rates, the collection was increased substantially in 2008-09. A uniform rate of 5% will bring additional revenues in the forms of withholding tax which will further improve tax revenues from WHT on imports.

## **Conclusion and Recommendations**

The withholding tax on import is the second major revenue generation source of the withholding tax. The receipts from withholding tax on imports have recorded substantial growth in recent years and it is highly likely that it will become top revenue generation source in the couple of years. The government of Pakistan has abolished the special excise duty on imports on a large number of items. So there is a vast scope of increasing tax receipts from withholding tax on import stage. In the face of more revenue requirement by the government, withholding tax will definitely attract the attention of Budget makers of the country.

The rate structure of withholding tax on imports has been quite complex. Frequent revisions in the tax rates of withholding tax on imports have been an issue. Moreover, a range of reduced rates are also applicable. There might be a apprehension that this facility can be misused, for instance, in case of industrial undertaking where imported raw materials, for their own use, are allowed at reduced rates but can be used for somewhere else as there is no mechanism to check it. This can create injustice to the genuine importers as their cost of business will be higher.

The time has come to rationalize the rates of withholding tax on imports. A uniform rate of 5% will be suitable for enhancing tax revenues but also will bring equality in the system. All the reduced rates may be converted into full standard rate of 5% and the benefit of adjustability may also be granted to these importers so that each transaction leaves a trail to be followed by the FBR. Similarly, the compliance of submission of statement of withholding tax needs to be improved; this will also be a good step towards documentation.

There are a number of exemptions which can be withdrawn. These includes chapter 27, (mainly relating to petroleum product may be brought into tax net except crude oil (27.09)). Moreover, exemption of import of trading houses may also be withdrawn. Exemptions to Plant, machinery and equipment from withholding tax on imports may be withdrawn on the ground that most of the machinery items in sales tax regime have also been withdrawn in mid- March, 2011.

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*Crude oil is exempted from customs, sales tax and FED.*

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### III

## Industry Profile: Banking Sector in Pakistan

*By*

**Naeem Ahmed<sup>7</sup>**

### Introduction

Banking sector plays an important role in economic development by channeling the funds from surplus sector to the deficit sector of economy. The role of banks as a funds provider is central in every economy, but in a developing country like Pakistan it becomes even more vital. Banking sector contributes significantly in the economy of Pakistan in shape of capital formation, tax revenues especially in direct taxes, facilitating international trade & investments, supply of credit to the agriculture sector and employment generation directly & indirectly.

A phenomenal change has been witnessed in the banking industry of Pakistan in recent years, owing to the liberal reforms and restructuring executed by the State Bank.<sup>8</sup> The industry has been transformed from an indolent, government dominated sector into a much more active, competitive and profitable industry. The new generation private banks have now established themselves in the system and have set new standards of service and efficiency<sup>9</sup>. The functions of banks start from retail banking and extend to investment and corporate banking, thus create a number of economic and financial opportunities.

In 2006 a study was conducted on “Banking Sector in Pakistan” and was published in FBR Quarterly Review. However, during last five years industry has grown substantially and economy has witnessed many ups and down, hence there was a need to again review the banking industry which is major part (88%) of financial sector of Pakistan. This study analyses the contribution of banking sector in the economy with major focus on tax policy initiatives for banking sector, impact of policy measures on tax revenues and the related issues.

**Literature Review:** Banking is now an essential part of our economic system. International trade and commerce seems extremely difficult without speedy banking services. Most of the economists agree that the banking sector contributes a lot in the

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Thanks are also due to Syed Shoaib Iqbal (DR&S) and Mr. Zafar Iqbal (PRAL) for data support.

<sup>8</sup> See *Issue # 33*, Mergers and Acquisitions, *Economic report April 4th, 2007*, Research Desk Treasury and FX Group MCB BANK Ltd.

<sup>9</sup> <http://www.competitionmaster.com/ArticleDetail.aspx?ID=41e9ef66-3271-418d-b344-09f76d6f59a1>

economy as individuals, large corporations and governments depend on banks for borrowing. In this regard Miwa and Ramseyer (2000) have quoted Alexander Gerschenkron claiming that banks facilitate economic growth in backward countries and in 1990s and 2000s, many theorists claimed that banks helps economy to grow. There is a sufficient literature supporting the argument that countries with better and efficient financial systems grow faster (Kasekende 2008). According to Gross (2001) financial intermediaries play a significant role in determining the type of investment activities, the job creation and distribution of income.

Khan and Senhadji (2000) have summarized the benefits of banks and say that financial intermediaries help in number of ways like; i) facilitating trade, hedging, diversifying, and pooling of risk, ii) efficiently allocating resources, iii) mobilizing savings, iv) facilitating the exchange of goods and services. In sum financial system facilitates the allocation of resources over space and time. Moreover, facility of internet banking, ATMs and the credit/debit cards has helped millions of the customers<sup>10</sup>. Without rural or farm credit agriculture sector can't grow and prosper, which in many countries like Pakistan is the backbone of economy.

### **Banking Sector in Pakistan**

At the time of independence, Pakistan started with a dilapidated banking structure with only 4 local commercial banks with 23 branches in operation in both parts of the country<sup>11</sup>. The banking sector has witnessed many ups and downs since then. These events can be divided into three distinct time periods, namely; the era of industrialization (1947-1968), the episode of nationalization (1974-1990) and re-emergence of liberalized financial activities (1991-2005).

The financial sector of Pakistan consists of Scheduled Commercial Banks which include nationalized, foreign, and private banks; and Non-banking Financial Institutions (NBFIs). The NBFCs include; Development Finance Institutions (DFIs), Investment Banks, leasing companies, Modarabas, and housing finance companies. In 1974 all domestic commercial banks were nationalized by the Government. Pakistan Banking Council was established, which assumed the role of a banking holding company but with limited supervisory powers. PBC was dissolved in 1997, leaving the SBP as the sole regulatory authority for banks and financial institutions in Pakistan.

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<sup>10</sup> <http://www.competitionmaster.com/ArticleDetail.aspx?ID=41e9ef66-3271-418d-b344-09f76d6f59a1>

<sup>11</sup> FBR Quarterly Review April-June 2006, [www.fbr.gov.pk](http://www.fbr.gov.pk) /SBP Report 2011

Now in 2011-12, 23 private banks and five public sector commercial banks are operating in Pakistan (Annex-1). There are also 4 specialized scheduled banks, 6 foreign banks, Development Financial Institutions (Non-bank) and microfinance banks in the country. Total number of branches of commercial banks is nearly 10,000, with assets of all banks Rs. 7,715 billion (Economic survey/SBP). It is very substantial increase in short span of four years (Table 1) as the assets of banks have increased by 37%, deposits by 41% and profit after tax by 19%.

**Table: 1 Key Banking Statistics**

(Rs. Billion)

	CY08	CY09	CY10	CY11
Total Assets	5628	6516	6782	7715
Advances	3173	3240	3231	3383
Deposits	4218	4786	5128	5965
Equity	563	660	668	723
Profit after tax	43	54	36	51

Source: (SBP Reports)

### Islamic Banking:

In Pakistan the Islamic Banking has emerged as a response to both religious and economic needs. During last few years a significant growth in the market share has been witnessed. The government of Pakistan has taken a number of initiatives since 1979 to introduce interest free products in banking sector. During 1990s the Islamic banking practices were initiated in many countries. In December 2001 SBP issued detailed criteria for the establishment of full-fledged Islamic bank in private sector. Currently there are 5 Islamic banks working in Pakistan and a robust growth has been witnessed in most of the indicators of Islamic Banking (Table 2).

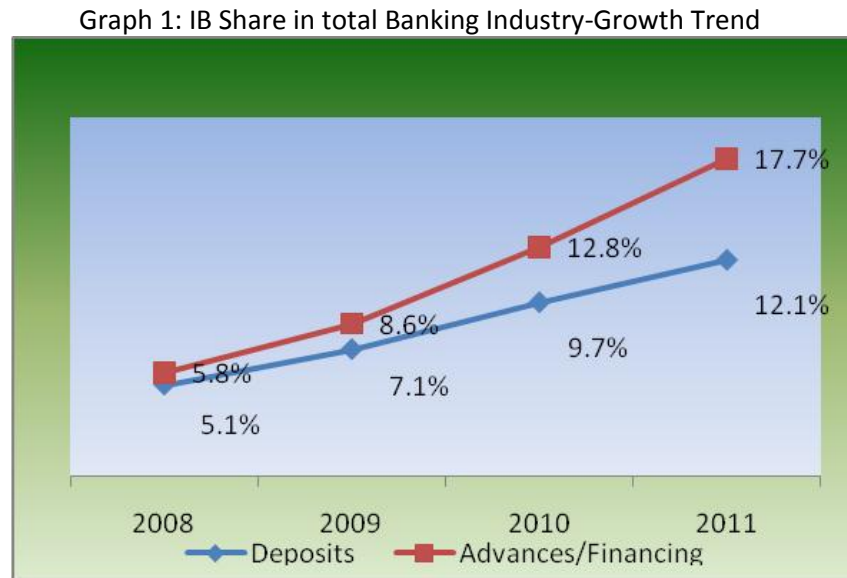
**Table 2: Existing Position and Growth Forecasts**

Rs. Million

	2008	2009	2010	2011	2012*
<b>Deposits</b>	215,938	340,128	499,036	722,109	907,064
Growth	-	58%	47%	45%	26%
<b>Financing</b>	84,641	277,153	413,594	600,014	731,591
Growth	-	50%	49%	45%	22%
<b>Human Resource Requirement</b>	9,601	13,063	16,181	19,220	20,953
Growth	-	36%	24%	19%	9%

(\*) forecast

Deposits and advances of Islamic Banks have increased very rapidly during last few years and so is the share in banking sector, as evident from Graph 1.



There is a lot of scope for Islamic Banking in future as it can attract a large unbanked segment of population which avoids interest based banking. The performance of Islamic Banks during last five years supports this claim.

### **Banking Sector and Contribution to the Economy**

Following are the major areas where role of banking sector is supportive and vital in the creation of economic activities.

#### **Capital Formation**

There is a direct link between credit availability and investment. Theoretically, higher is the magnitude of capital formation when cost of borrowing is low, *ceteris paribus*. For banks, credit remains the main source of interest income. Recently, the growing difference between lending and deposit rates has become the major source of net interest income (NII) for the commercial banks. The advances of banking sector have substantially increased from Rs. 1 trillion in 2002 to around Rs. 3.4 trillion in 2011 i.e. reflecting 240% growth<sup>12</sup>. The leading banks in respect of assets, deposits, advances and investments were: NBP, HBL, UBL, MCB, ABL, Bank Al-Falah and Standard Chartered Bank.

The sectoral share in lending is shown in Table 3. Major share goes to textile (19%), energy (11%) and sugar (3%). Other major sectors which are facilitated by the banks are cement, leather and automobile.

<sup>12</sup> Table 1, FBR Quarterly April-Jun 2006/SBP Report 2011

**Table 3: Sectoral Share in Lending***(Rs. billion)*

Sectors	Dec-09	June-10	June-10	Share (%)
Textile	648	594	657	19
Production & Transmission of Energy	294	327	374	11
Sugar	62	82	122	3
Cement	95	91	81	2
Shoes & Leather Garments	21	21	25	1
Automobiles & Transport equipment	52	47	41	1
Others	2167	2179	2224	63
Total	3339	3341	3523	100

*Source: SBP Annual report 201, Ch.1*

**Employment Generation:** The growing need of employment is substantiated by the fact that out of 54.9 million civilian labor force, 3.1 million people are unemployed in the country<sup>13</sup>. In this backdrop, creation of new job opportunities always remains one of the top priorities of the government. Although major contribution of the banking sector is credit provision for promotion of investment in the country, but its role in employment generation is also considerable. According to the available information, around 100,000 people are directly employed in the banking sector<sup>14</sup>.

**Tax Revenues:** Banks also contribute in shape of tax revenues to the government exchequer. The detailed discussion on the tax policy, revenue contribution by the banking sector and related issues has been given in the following paragraphs.

### ***Tax Policy***

Taxes are one of the tools of fiscal policy applied for multifaceted objectives like revenue generation, equitable distribution of resources, facilitation of taxpayers and to promote investment in the economy. FBR being the major revenue collecting organization have been trying to frame tax policies to attain these objectives. In this regard banking sector along with other corporate sector has been given special attention particularly after the initiation of tax policy and administrative reforms. The banking companies were overburdened with high income tax rates during early 1990s in Pakistan.

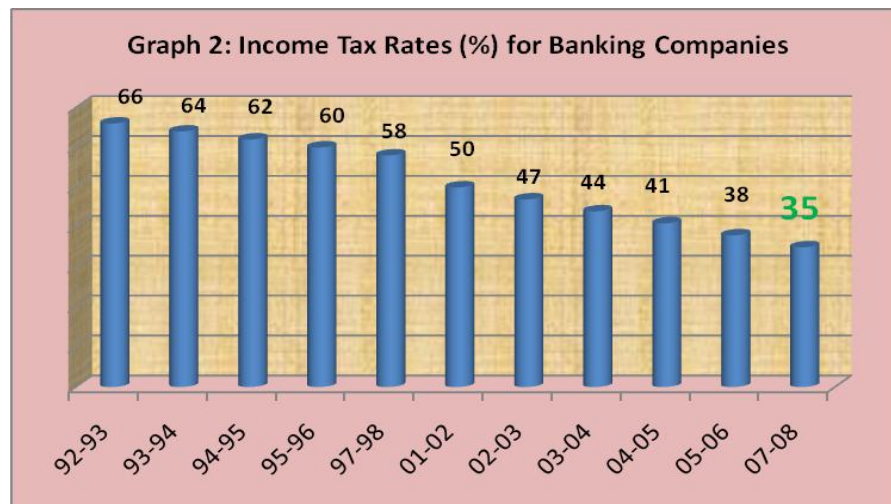
<sup>13</sup> Economic Survey 2010-11, p/157

<sup>14</sup> NBP Economic Bulletin January-February 2011



A separate schedule “The Seventh Schedule” has been added in Income Tax Ordinance 2001, dealing with the income, profits, gains and tax payable by the banking companies. According to section 5(1) of Seventh Schedule the banking company shall be required to pay advance tax for the year under section 147 in twelve equal installments payable by 15<sup>th</sup> of every month. The income tax rate structure of banking companies is given in The First Schedule of Income Tax Ordinance, 2001.

**Rate Structure for Banking Companies:** Keeping in view the bad impacts of high tax rates, FBR took bold initiatives and offered drastic reduction in tax rates of banking companies under the ongoing tax reform program. The rates of tax imposed on taxable income of a banking company have been gradually reduced from 66% in 1992 to 35% in 2007 and onwards (Graph 2), with the expectation of better compliance by the banking sector.



The overall reduction in the tax rates is nearly 50% i.e. from 66% in 1992-93 to 35% in 2007, which is in fact a major shift in tax policy to favor the corporate taxpayers and to attract investments in the country.

**Rate Structure of Withholding Taxes:** By acting as withholding agents for the government, the banks collect WHT on various heads like bank interest, securities and more recently on cash withdrawal and advance tax on transactions in banks. The sections under which these withholding taxes are collected are depicted in Table 4.

**Table 4: Rate Structure of Withholding taxes collected by Banks**

Sections	Heads	Rates
u/s 151 (1) (a)	Profit on debt- NSC/PO	@ 10%
u/s 151 (1) (b)	Profit on debt- Bank Deposits	@ 10%
u/s 151 (1) (c)	Profit on debt- Govt Securities	@ 10%
u/s 151 (1) (d)	Profit on debt- Other Securities	@ 10%
u/s 231 A	Cash Withdrawal	@ 0.2%
u/s 231 AA	Advance Tax on Transaction in bank	@ 0.3%

**Income Tax Base:** Banking sector base during 2011 consisted of 46 banks that can be categorized into public, private, foreign, and specialized banks (Table 5). The complete list of the banks is provided as Annex-1.

**Table 5: Historical Composition of Banks**

Categories	1998	2003	2005	2011
Public Sector Commercial Banks	6	5	4	5
Local Private Banks (including DFIs)	16	18	20	31
Foreign Banks	20	14	11	6
Specialized Banks	4	3	4	4
<b>Total</b>	<b>46</b>	<b>40</b>	<b>39</b>	<b>46</b>

### ***Tax Contribution by the Banks***

The banking sector has also been an important source of tax revenues. The increased profitability has led to higher tax contribution in absolute terms particularly during last few years. The gross and net income tax collection from banking sector was Rs. 50 billion and Rs. 37 billion respectively in FY: 2006-07, which increased to Rs.75.6 billion and Rs. 47.5 billion in FY: 2011-12 during July-March. However, despite enormous profits declared by the banks, the share of banking sector tax payment in income tax receipts has hovered around 10% during last six years (Table 6).

**Table 6: Income Tax Collected from Banking Sector***(Rs. Billion)*

Year	Collection			Growth % in Net Collection	Share (%) in Net Income Tax
	Gross	Refund	Net		
2006-07	50,046	12,701	37,345		9.6
2007-08	50,111	6,426	43,685	17.0	9.8
2008-09	68,900	10,453	58,447	33.8	11.1
2009-10	73,659	18,135	55,524	-5.0	9.2
2010-11	73,869	8,300	65,569	18.1	10.9
2011-12 (July-Mar)	75,596	28,048	47,548		9.9
2010-11(July-Mar)	44,922	4,809	40,113	18.5	10.5

*Source: MPR/FBR Yearbook*

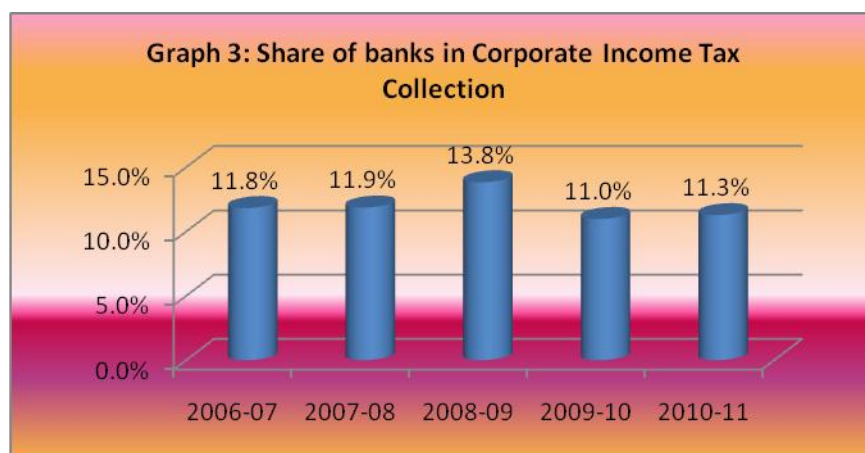
The refund payments to banking sector particularly, in CFY have grown enormously i.e. Rs. 28 billion up to March 2012 against only Rs.4.7 billion in the corresponding period last year. Out of Rs. 76.2 billion direct taxes refunds in July-March 2011-12 Rs. 67.1 billion have been issued by the LTUs, moreover, the major chunk i.e. around 42% have been issued to the banks in the said period as illustrated in Table 7.

**Table 7: LTU-wise Refunds Issued to Banks***Rs million*

LTUs	JULY-MARCH				Growth %	Share % of Banks
	Total Refunds issued by LTU's		Refunds Issued to Banking Companies			
	2011-12	2010-11	2011-12	2010-11		
Karachi	36,922	14,838	16,815	1,148	1,365	46
Islamabad	26,699	3,643	10,593	2,852	271	40
Lahore	3,500	4,527	579	717	-19	17
Total	67,121	23,008	27,987	4,717	493	42

### Collection Share of Banking Sector in Corporate Income Tax:

The collection share of banking sector in total corporate income tax increased to 13.8% in 2008-09 but again started declining and reached to 11.3% in 2010-11 (Graph 3). Keeping in view the hefty profits of banking sector in last few years the share of income tax should have also risen.



Another area which needs detailed analysis is the composition of income tax paid by the banking sector. The data in this regard is reflected in Table 8. It is believed that the banking sector is one of the most documented and growing sectors of the economy. The analysis of share of income tax paid by banks under various heads invites attention of the concerned quarters. In 2006-07 banks deposited 23% of their total income tax with return and just 6% from collection out of demand, apparently a pleasant outcome of USAS. However, in the later years, this pattern changed and share of payment with return lowered to 1-2% and CoD share increased significantly i.e. 30-46%. Therefore, one may perceive that substantial increase in CoD is apparently the underreporting and concealment in income tax returns submitted by the banks. Nonetheless, it is encouraging to note that field formations through the appropriate efforts collected the concealed revenue to great extent.

**Table 8: Composition of Income Tax Paid by Banking Sector**

Years	With Return	Advance	Withholding	CoD
2006-07	23%	61%	9%	6%
2007-08	3%	62%	6%	30%
2008-09	1%	52%	1%	46%
2009-10	1%	59%	3%	37%
2010-11	2%	64%	2%	32%
2011-12	1%	49%	8%	42%

The above Table also reflects that advance tax during CFY has declined and 49% of collection has been realized through advance tax against 64% in the corresponding period of PFY.

It is pertinent to mention that FBR has changed its policies in shape of USAS and drastic reduction in rates, to create taxpayers friendly environment in the country and for the

economic development, now it is the responsibility of all the taxpayers and specifically, the corporate taxpayers and the Banks to pay their due share to help enable the economy to grow and flourish.

**Withholding Taxes:** By acting as withholding agents for the government, the banks collect WHT on various heads like bank interest, securities, on cash withdrawal and more recently advance tax on transaction in banks. The sections under which these withholding taxes are collected are; u/s 231 A @0.2% Cash Withdrawal, u/s 231 AA @0.3% (Advance Tax on Transaction in bank), u/s 151 (1) (a) @10% Profit on debt- Bank Deposits, u/s 151 (1) (b) @10% Profit on debt- Bank Deposits, u/s 151 (1) (c) @10% Profit on debt- Govt Securities, u/s 151 (1) (d) @10% Profit on debt- Other Securities.

Major source of revenue is WHT on interest payment on savings @ 10%. Its share in income tax receipts ranged between 2.2% and 4.8% during last five years. In absolute terms, the collection has been between Rs. 6.4 billion and Rs. 16.1 billion during 2005-06 and 2010-11 (Table 9).

**Table 9: Withholding Taxes**

(Rs.Billion)

Years	Collection	
	(U/s 231A) Cash Withdrawal	U/s 151 Bank Interest & Securities
2005-06	2.4	10.2
2006-07	4.8	13.7
2007-08	6.4	14.1
2008-09	11.3	16.1
2009-10	12.9	19.9
2010-11	21.3	23.4
2011-12 (JM)	8.6	23.0
2010-11 (JM)	10.4	16.7
Growth%	-17.3	37.1

Withholding tax on cash withdrawal @ 0.1% on amount exceeding Rs. 25,000/- was levied from 1<sup>st</sup> July 2005. This rate was raised to 0.2% effective July 2006. In order to check misuse of the provision, the limit of Rs. 25,000/- per transaction has been changed from per transaction to per day basis. During FY: 05-06, the first year, an amount of Rs. 2.4 billion was collected, however, in the coming years the amount gradually increased and touched Rs. 21 billion in 2010-11. The rate was enhanced from 0.2% to 0.3%. However, in the

CFY, the collection from cash withdrawal has declined by around 17% as the rate was again reduced to 0.2% from 0.3% in the Budget FY: 2011-12.

Another recently introduced withholding tax was Advance Tax on Transaction in bank (u/s 231 AA @0.3%). The collection realized from this head in first nine months of CFY has been Rs.235 million against Rs.94 million in July-March 2010-11 it's first year of inception. This area needs vigilance and monitoring as the collection realized so far looks less than the potential.

**Indirect Taxes:** The nature of the banking business is such that there is limited scope for indirect taxes. However, in the past federal excise duty was charged @1% on bank loans and advances in 1991-92 and continued till 1996-97. The amount collected under this head had ranged from Rs.711 million in 1991-92 to Rs. 2538 million in 1996-97. Notwithstanding this significant amount, it was not perceived as a good tax as it was discouraging investment. In order to streamline the system and to promote investment in the country, the government withdrew the said excise duty in 1997.

**Sales tax Domestic:** Since FY: 2009-10 the banking services are being collected under the VAT mode. Earlier banking services were being collected under the FED in 2007-08 and 2008-09. Then they were transferred to VAT mode. The year-wise collection is reflected in the table below.

**Table 10: Collection from Banking Services**

(Rs. Million)

Years	VAT Mode	FED Collection
2007-08	-	1334
2008-09	-	3007
2009-10	4736	501
2010-11	5290	-
2011-12 (JM)	2454	
2010-11 (JM)	3911	

Note 2011-12 excludes Sindh

### Issues and Concerns

**Low Tax Contribution:** It has been observed that profits of banks have increased significantly during last five years and particularly, in 2010-11. Nonetheless, in response to the governments' policy of reduction in tax rates, the revenue contribution by the banks has not been much encouraging and the outcome falls short of expectations to some extent and hence, the tax contribution of the banking sector appears to be inconsistent with its profits.

***Changed Composition of Income Tax:*** Similarly, increasing share of collection out of demand from the banking sector is not a healthy sign when USAS is in vogue. The USAS was basically the trust shown by the revenue organization in the taxpayers to enhance the confidence in the revenue collecting organization. It is imperative to mention that collection with return was 23% in 2006-07 which has plummeted to 1% in 2010-11 and contrary to this share of CoD which was 6% has increased to 42% during the same period. The increased share of CoD also shows the appropriate efforts of field staff to check the concealment cases. Nonetheless, the decreasing share of collection with return and advances and on the other hand increased share of CoD raises the questions. Like; how far it is safe to allow the taxpayers and particularly to the large taxpayers to assess their income and taxes by themselves and secondly, how audit department would tackle the concealment cases? Certainly there is a need to make foolproof system and to take effective measures to safeguard the public money.

***Higher Refund Payments to Banks:*** Most of the banks are registered in the LTUs. It has been observed that during the CFY higher refunds have been paid to the banks as compared to July-March period last year. Share of the banking sector refund in corporate sector has been more than 40%. In absolute terms Rs 23.3 billion higher refund payments in July-March CFY as compared to PFY were made. The question is why such huge refunds were generated? The increased refund payments to banking sector in July-March 2011-12 need to be examined by the concerned quarters.

***Collection from Cash Withdrawal:*** A substantial decline in the collection from withholding taxes on cash withdrawal is justifiable to some extent as its rate of tax was reduced in the budget FY 2011-12. However, it was expected that the reduction in rates would be compensated through the natural growth in economic activities and overall GDP, but these estimations fell short of expectations. Therefore, concerned field formations need to monitor the collection under this head to realize the revenue as per the potential. Similarly, it appears that the recently introduced “Advance Tax on Transaction” in bank could not produce desired results. The collection realized from this head in first nine months of CFY has been Rs.235 million against Rs.94 million in July-March 2010-11. This area also needs proper monitoring.

***Rising Spreads and Low profits on Deposits:*** According to SBP banking system of Pakistan is characterized by high banking spreads, which are generally linked to the efficiency of financial intermediation and competition in the banking sector<sup>15</sup>. The same

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<sup>15</sup> See SBP Annual Report 2011

has been pointed out by the IMF Country report<sup>16</sup>. The data confirms that the bank spread between borrowing and lending rates has been on the higher side. Whereas the deposit rates have ranged between 1.2% and 2.7%, the lending rates have ranged between 8.8% to 13.5% during 2004-5 to and 2010-11. The rising spread is certainly good for the banks but may not be for the borrowers and the small and medium depositors who hardly earn anything on their deposits. At macro level high spreads impede financial intermediation by discouraging potential savings with low returns on deposits, thus constraining investment activities with a high cost of borrowing (SBP Report).

**Table 11: Lending and Deposit Rates (% per annum)**

	04-05	05-06	06-07	07-08	08-09	09-10	10-11
Deposits Rates	1.37	1.96	2.6	4.13	4.44	4.2	4.53
Advances Rates	8.81	10.61	11.55	12.49	14.5	13.63	13.46
<b><i>Spread</i></b>	<b><i>7.44</i></b>	<b><i>8.65</i></b>	<b><i>8.95</i></b>	<b><i>8.36</i></b>	<b><i>10.06</i></b>	<b><i>9.43</i></b>	<b><i>8.93</i></b>

Source: Economic Bulletin (Nov-Dec, 2011), NBP

In this regard the IMF suggestion of introducing more competition in shape of alternatives like NSS, investment products by insurance companies etc. in financial sector to low the spreads, seems workable. So there is a need to address the issues of small and medium depositors to encourage the savings, direly needed for investments and economic development.

### **Concluding Remarks**

The study has acknowledged the vital role played by the banking sector in economic development and growth of the economy of Pakistan. Despite certain limitations, the banking sector, by and large, has been able to channel resources from small and medium savers to the industrial and commercial concerns. The inefficiencies that had crept in the system due to prolonged public sector ownership after the banks were nationalized have been reduced to a great extent after the implementation of far reaching reforms in the last decade. It is expected that under the current regulatory framework of SBP the banking sector would become more strengthened and competitive and consequently, the industry will flourish and grow in coming years. Moreover, as the SBP, has already decided to adopt Basel II in Pakistan. It would be helpful to maintain safety and soundness, to enhance competitive equality and to introduce a more risk sensitive framework.

<sup>16</sup> IMF Country Report No.12/35



Regarding revenue receipts from the banking sector, it appears that the outcome falls short of expectations. It was perceived that the continuous and very substantial decline of banking rates and significant growth in the banking sector activities would have a positive impact on the income tax paid by the sector, but it has not happened so far. Similarly, the changed composition of direct taxes paid by the banks is a matter of concern. It is expected that the documented sector like banking would increase its share of tax payments through voluntary compliance. Moreover, the declining collection from cash withdrawal is also not a healthy sign and should be monitored minutely.

After the substantial reduction in the corporate income tax rates i.e. 66% to 35% over the years and significant increase in the profits of banking sector, the responsibility now falls on the banking sector to contribute to the national economy through its fair share of income taxes. The problems faced by Pakistan economy like rising public debt, fiscal deficit, low tax/GDP ratio etc. can be tackled effectively if the corporate sector and, particularly, the banking sector starts paying its due share of taxes.

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# **STATISTICAL APPENDIX**

Comparative Statements of  
Month – to – Month and Progressive  
Collection of  
Federal taxes 2011-12

## Collection of Taxes 2011-12

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Goss	Reb/Ref	Net	Goss	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	162,084	49,808	112,276	87,371	10,223	77,148	74,713	39,585	35,128	85.5	387.2	45.5
AUGUST	M	125,424	4,918	120,506	105,935	5,995	99,940	19,489	-1,077	20,566	18.4	-18	20.6
	P	287,508	54,726	232,782	193,306	16,218	177,088	94,202	38,508	55,694	48.7	237.4	31.4
SEPTEMBER	M	154,421	6,398	148,023	123,005	6,598	116,407	31,416	-200	31,616	25.5	-3	27.2
1st Quarter		441,929	61,124	380,805	316,311	22,816	293,495	125,618	38,308	87,310	39.7	167.9	29.7
OCTOBER	M	132,591	6,183	126,408	114,354	10,807	103,547	18,237	-4,624	22,861	15.9	-42.8	22.1
	P	574,520	67,307	507,213	430,665	33,623	397,042	143,855	33,684	110,171	33.4	100.2	27.7
NOVEMBER	M	139,028	7,180	131,848	110,108	7,076	103,032	28,920	104	28,816	26.3	1.5	28
	P	713,548	74,487	639,061	540,773	40,699	500,074	172,775	33,788	138,987	31.9	83	27.8
DECEMBER	M	213,805	12,129	201,676	168,462	6,882	161,580	45,343	5,247	40,096	26.9	76.2	24.8
2nd Quarter		485,424	25,492	459,932	392,924	24,765	368,159	92,500	727	91,773	23.5	2.9	24.9
Upto 2nd Qtr		927,353	86,616	840,737	709,235	47,581	661,654	218,118	39,035	179,083	30.8	82	27.1
JANUARY	M	150,311	14,308	136,003	120,054	11,641	108,413	30,257	2,667	27,590	25.2	22.9	25.4
	P	1,077,664	100,924	976,740	829,289	59,222	770,067	248,375	41,702	206,673	30	70.4	26.8
FEBRUARY	M	143,362	9,974	133,388	113,662	7,752	105,910	29,700	2,222	27,478	26.1	28.7	25.9
	P	1,221,026	110,898	1,110,128	942,951	66,974	875,977	278,075	43,924	234,151	29.5	65.6	26.7
MARCH	M	178,472	8,204	170,268	149,372	5,200	144,172	29,100	3,004	26,096	19.5	57.8	18.1
3rd Quarter		472,145	32,486	439,659	383,088	24,593	358,495	89,057	7,893	81,164	23.2	32.1	22.6
Upto 3rd Qtr		1,399,498	119,102	1,298,796	1,092,323	72,174	1,020,149	307,175	46,928	260,247	28.1	65	27.3
APRIL	M				137,143	7,457	129,686						
	P				1,229,466	79,631	1,149,835						
MAY	M				172,890	13,267	159,623						
	P				1,402,356	92,898	1,309,458						
JUNE	M				261,699	13,143	248,556						
4th Quarter					571,732	33,867	537,865						
Annual					1,664,057	106,043	1,558,014						

(\*) M- Monthly, P-Progressive

(\*) Includes Rs.18.3 billion collected by SRB on services

## DIRECT TAXES

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	72,547	43,581	28,966	25,297	7,195	18,102	47,250	36,386	10,864	186.8	505.7	60
AUGUST	M	33,730	1,661	32,069	28,490	2,484	26,006	5,240	-823	6,063	18.4	-33.1	23.3
	P	106,277	45,242	61,035	53,787	9,679	44,108	52,490	35,563	16,927	97.6	367.4	38.4
SEPTEMBER	M	65,262	1,755	63,507	53,223	1,613	51,610	12,039	142	11,897	22.6	8.8	23.1
1st Quarter		171,539	46,997	124,542	107,010	11,292	95,718	64,529	35,705	28,824	60.3	316.2	30.1
OCTOBER	M	42,296	2,637	39,659	36,995	2,777	34,218	5,301	-140	5,441	14.3	-5	15.9
	P	213,835	49,634	164,201	144,005	14,069	129,936	69,830	35,565	34,265	48.5	252.8	26.4
NOVEMBER	M	47,395	1,974	45,421	35,283	2,615	32,668	12,112	-641	12,753	34.3	-24.5	39
	P	261,230	51,608	209,622	179,288	16,684	162,604	81,942	34,924	47,018	45.7	209.3	28.9
DECEMBER	M	110,200	7,255	102,945	81,481	3,208	78,273	28,719	4,047	24,672	35.2	126.2	31.5
2nd Quarter		199,891	11,866	188,025	153,759	8,600	145,159	46,132	3,266	42,866	30	38	29.5
Upto 2nd Qtr		371,430	58,863	312,567	260,769	19,892	240,877	110,661	38,971	71,690	42.4	195.9	29.8
JANUARY	M	49,664	8,084	41,580	42,074	5,214	36,860	7,590	2,870	4,720	18	55	12.8
	P	421,094	66,947	354,147	302,843	25,106	277,737	118,251	41,841	76,410	39	166.7	27.5
FEBRUARY	M	56,885	5,650	51,235	40,049	2,843	37,206	16,836	2,807	14,029	42	98.7	37.7
	P	477,979	72,597	405,382	342,892	27,949	314,943	135,087	44,648	90,439	39.4	159.7	28.7
MARCH	M	76,833	3,554	73,279	68,183	1,509	66,674	8,650	2,045	6,605	12.7	135.5	9.9
3rd Quarter		183,382	17,288	166,094	150,306	9,566	140,740	33,076	7,722	25,354	22	80.7	18
Upto 3rd Qtr		554,812	76,151	478,661	411,075	29,458	381,617	143,737	46,693	97,044	35	158.5	25.4
APRIL	M				51,866	2,231	49,635						
	P				462,941	31,689	431,252						
MAY	M				54,240	7,245	46,995						
	P				517,181	38,934	478,247						
JUNE	M				131,948	7,744	124,204						
4th Quarter					238,054	17,220	220,834						
Annual					649,129	46,678	602,451						

## SALES TAX (TOTAL)

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	66,668	4,994	61,674	42,902	2,102	40,800	23,766	2,892	20,874	55.4	137.6	51.2
AUGUST	M	66,572	2,177	64,395	54,163	2,595	51,568	12,409	-418	12,827	22.9	-16.1	24.9
	P	133,240	7,171	126,069	97,065	4,697	92,368	36,175	2,474	33,701	37.3	52.7	36.5
SEPTEMBER	M	63,134	3,886	59,248	45,409	4,076	41,333	17,725	-190	17,915	39	-4.7	43.3
1st Quarter		196,374	11,057	185,317	142,474	8,773	133,701	53,900	2,284	51,616	37.8	26	38.6
OCTOBER	M	66,333	2,607	63,726	54,011	7,227	46,784	12,322	-4,620	16,942	22.8	-63.9	36.2
	P	262,707	13,664	249,043	196,485	16,000	180,485	66,222	-2,336	68,558	33.7	-14.6	38
NOVEMBER	M	65,285	4,279	61,006	49,826	3,619	46,207	15,459	660	14,799	31	18.2	32
	P	327,992	17,943	310,049	246,311	19,619	226,692	81,681	-1,676	83,357	33.2	-8.5	36.8
DECEMBER	M	75,115	4,158	70,957	58,907	2,996	55,911	16,208	1,162	15,046	27.5	38.8	26.9
2nd Quarter		206,733	11,044	195,689	162,744	13,842	148,902	43,989	-2,798	46,787	27	-20.2	31.4
Upto 2nd Qtr		403,107	22,101	381,006	305,218	22,615	282,603	97,889	-514	98,403	32.1	-2.3	34.8
JANUARY	M	70,839	5,261	65,578	52,349	5,770	46,579	18,490	-509	18,999	35.3	-8.8	40.8
	P	473,946	27,362	446,584	357,567	28,385	329,182	116,379	-1,023	117,402	32.5	-3.6	35.7
FEBRUARY	M	60,631	3,565	57,066	49,201	4,207	44,994	11,430	-642	12,072	23.2	-15.3	26.8
	P	534,577	30,927	503,650	406,768	32,592	374,176	127,809	-1,665	129,474	31.4	-5.1	34.6
MARCH	M	68,745	4,011	64,734	51,940	3,445	48,495	16,805	566	16,239	32.4	16.4	33.5
3rd Quarter		200,215	12,837	187,378	153,490	13,422	140,068	46,725	-585	47,310	30.4	-4.4	33.8
Upto 3rd Qtr		603,322	34,938	586,685	458,708	36,037	422,671	144,614	-1,099	145,713	31.5	-3	34.5
APRIL	M				56,595	4,295	52,300						
	P				515,303	40,332	474,971						
MAY	M				83,971	5,290	78,681						
	P				599,274	45,622	553,652						
JUNE	M				84,918	5,213	79,705						
4th Quarter					225,484	14,798	210,686						
Annual					684,192	50,835	633,357						

## SALES TAX (IMPORTS)

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	37,311	1	37,310	20,670	3	20,667	16,641	-2	16,643	80.5	-66.7	80.5
AUGUST	M	34,150	1	34,149	22,820	0	22,820	11,330	1	11,329	49.6	#DIV/0!	49.6
	P	71,461	2	71,459	43,490	3	43,487	27,971	-1	27,972	64.3	-33.3	64.3
SEPTEMBER	M	32,663		32,663	20,470	0	20,470	12,193	0	12,193	59.6	#DIV/0!	59.6
1st Quarter		104,124	2	104,122	63,960	3	63,957	40,164	-1	40,165	62.8	-33.3	62.8
OCTOBER	M	33,833	0	33,833	25,136	0	25,136	8,697	0	8,697	34.6	#DIV/0!	34.6
	P	137,957	2	137,955	89,096	3	89,093	48,861	-1	48,862	54.8	-33.3	54.8
NOVEMBER	M	34,903	1	34,902	22,197	0	22,197	12,706	1	12,705	57.2	#DIV/0!	57.2
	P	172,860	3	172,857	111,293	3	111,290	61,567	0	61,567	55.3	0	55.3
DECEMBER	M	38,696	1	38,695	30,774	13	30,761	7,922	-12	7,934	25.7	-92.3	25.8
2nd Quarter		107,432	2	107,430	78,107	13	78,094	29,325	-11	29,336	37.5	-84.6	37.6
Upto 2nd Qtr		211,556	4	211,552	142,067	16	142,051	69,489	-12	69,501	48.9	-75	48.9
JANUARY	M	36,331	1	36,330	25,610	0	25,610	10,721	1	10,720	41.9	#DIV/0!	41.9
	P	247,887	5	247,882	167,677	16	167,661	80,210	-11	80,221	47.8	-68.8	47.8
FEBRUARY	M	31,323	0	31,323	20,839	23	20,816	10,484	-23	10,507	50.3	-100	50.5
	P	279,210	5	279,205	188,516	39	188,477	90,694	-34	90,728	48.1	-87.2	48.1
MARCH	M	33,695	0	33,695	23,508	5	23,503	10,187	-5	10,192	43.3	-100	43.4
3rd Quarter		101,349	1	101,348	69,957	28	69,929	31,392	-27	31,419	44.9	-96.4	44.9
Upto 3rd Qtr		312,905	5	312,900	212,024	44	211,980	100,881	-39	100,920	47.6	-88.6	47.6
APRIL	M				25,338	1	25,337						
	P				237,362	45	237,317						
MAY	M				38,311	0	38,311						
	P				275,673	45	275,628						
JUNE	M				33,021	1	33,020						
4th Quarter					96,670	2	96,668						
Annual					308,694	46	308,648						

## SALES TAX (DOMESTIC)

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	29,357	4,993	24,364	22,232	2,099	20,133	7,125	2,894	4,231	32	137.9	21
AUGUST	M	32,422	2,176	30,246	31,343	2,595	28,748	1,079	-419	1,498	3.4	-16.1	5.2
	P	61,779	7,169	54,610	53,575	4,694	48,881	8,204	2,475	5,729	15.3	52.7	11.7
SEPTEMBER	M	30,471	3,886	26,585	24,939	4,076	20,863	5,532	-190	5,722	22.2	-4.7	27.4
1st Quarter		92,250	11,055	81,195	78,514	8,770	69,744	13,736	2,285	11,451	17.5	26.1	16.4
OCTOBER	M	32,500	2,607	29,893	28,875	7,227	21,648	3,625	-4,620	8,245	12.6	-63.9	38.1
	P	124,750	13,662	111,088	107,389	15,997	91,392	17,361	-2,335	19,696	16.2	-14.6	21.6
NOVEMBER	M	30,382	4,278	26,104	27,629	3,619	24,010	2,753	659	2,094	10	18.2	8.7
	P	155,132	17,940	137,192	135,018	19,616	115,402	20,114	-1,676	21,790	14.9	-8.5	18.9
DECEMBER	M	36,419	4,157	32,262	28,133	2,983	25,150	8,286	1,174	7,112	29.5	39.4	28.3
2nd Quarter		99,301	11,042	88,259	84,637	13,829	70,808	14,664	-2,787	17,451	17.3	-20.2	24.6
Upto 2nd Qtr		191,551	22,097	169,454	163,151	22,599	140,552	28,400	-502	28,902	17.4	-2.2	20.6
JANUARY	M	34,508	5,260	29,248	26,739	5,770	20,969	7,769	-510	8,279	29.1	-8.8	39.5
	P	226,059	27,357	198,702	189,890	28,369	161,521	36,169	-1,012	37,181	19	-3.6	23
FEBRUARY	M	29,308	3,565	25,743	28,362	4,184	24,178	946	-619	1,565	3.3	-14.8	6.5
	P	255,367	30,922	224,445	218,252	32,553	185,699	37,115	-1,631	38,746	17	-5	20.9
MARCH	M	35,050	4,011	31,039	28,432	3,440	24,992	6,618	571	6,047	23.3	16.6	24.2
3rd Quarter		98,866	12,836	86,030	83,533	13,394	70,139	15,333	-558	15,891	18.4	-4.2	22.7
Upto 3rd Qtr		290,417	34,933	273,785(*)	246,684	35,993	210,691	43,733	-1,060	44,793	17.7	-2.9	21.3
APRIL	M				31,257	4,294	26,963						
	P				277,941	40,287	237,654						
MAY	M				45,660	5,290	40,370						
	P				323,601	45,577	278,024						
JUNE	M				51,897	5,212	46,685						
4th Quarter					128,814	14,796	114,018						
Annual					375,498	50,789	324,709						

(\*) Rs.18.3 billion collected by SRB on services

## FEDERAL EXCISE

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	9,668		9,668	7,293		7,293	2,375	0	2,375	32.6	-	32.6
AUGUST	M	9,867		9,867	10,322		10,322	-455	0	-455	-4.4	-	-4.4
	P	19,535	0	19,535	17,615	0	17,615	1,920	0	1,920	10.9	-	10.9
SEPTEMBER	M	8,900	0	8,900	9,296	0	9,296	-396	0	-396	-4.3	#DIV/0!	-4.3
1st Quarter		28,435	0	28,435	26,911	0	26,911	1,524	0	1,524	5.7	#DIV/0!	5.7
OCTOBER	M	8,507	0	8,507	10,242	0	10,242	-1,735	0	-1,735	-16.9	-	-16.9
	P	36,942	0	36,942	37,153	0	37,153	-211	0	-211	-0.6	-	-0.6
NOVEMBER	M	9,596	0	9,596	10,779	0	10,779	-1,183	0	-1,183	-11	-	-11
	P	46,538	0	46,538	47,932	0	47,932	-1,394	0	-1,394	-2.9	-	-2.9
DECEMBER	M	6,914	1	6,913	10,216	1	10,215	-3,302	0	-3,302	-32.3	0	-32.3
2nd Quarter		25,017	1	25,016	31,237	1	31,236	-6,220	0	-6,220	-19.9	0	-19.9
Upto 2nd Qtr		53,452	1	53,451	58,148	1	58,147	-4,696	0	-4,696	-8.1	0	-8.1
JANUARY	M	11,859	219	11,640	10,564	0	10,564	1,295	219	1,076	12.3	-	10.2
	P	65,311	220	65,091	68,712	1	68,711	-3,401	219	-3,620	-4.9	-	-5.3
FEBRUARY	M	8,453	0	8,453	9,761	0	9,761	-1,308	0	-1,308	-13.4	-	-13.4
	P	73,764	220	73,544	78,473	1	78,472	-4,709	219	-4,928	-6	-	-6.3
MARCH	M	11,260	0	11,260	10,616	0	10,616	644	0	644	6.1	#DIV/0!	6.1
3rd Quarter		31,572	219	31,353	30,941	0	30,941	631	219	412	2	#DIV/0!	1.3
Upto 3rd Qtr		85,024	220	84,804	89,089	1	89,088	-4,065	219	-4,284	-4.6	21,900.00	-4.8
APRIL	M				13,088	0	13,088						
	P				102,177	1	102,176						
MAY	M				16,248	2	16,246						
	P				118,425	3	118,422						
JUNE	M				18,931	0	18,931						
4th Quarter					48,267	2	48,265						
Annual					137,356	3	137,353						



# CUSTOMS

(Rs Million)

MONTHS	M/P	Collection											
		FY 2011-12			FY 2010-11			COMPARISON			Growth (%)		
		Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net	Gross	Reb/Ref	Net
1	2	3	4	5	6	7	8	9	10	11	12	13	14
JULY	M	13,201	1,233	11,968	11,879	926	10,953	1,322	307	1,015	11.1	33.2	9.3
AUGUST	M	15,255	1,080	14,175	12,960	916	12,044	2,295	164	2,131	17.7	17.9	17.7
	P	28,456	2,313	26,143	24,839	1,842	22,997	3,617	471	3,146	14.6	25.6	13.7
SEPTEMBER	M	17,125	757	16,368	15,077	909	14,168	2,048	-152	2,200	13.6	-16.7	15.5
1st Quarter		45,581	3,070	42,511	39,916	2,751	37,165	5,665	319	5,346	14.2	11.6	14.4
OCTOBER	M	15,455	939	14,516	13,106	803	12,303	2,349	136	2,213	17.9	16.9	18
	P	61,036	4,009	57,027	53,022	3,554	49,468	8,014	455	7,559	15.1	12.8	15.3
NOVEMBER	M	16,752	927	15,825	14,220	842	13,378	2,532	85	2,447	17.8	10.1	18.3
	P	77,788	4,936	72,852	67,242	4,396	62,846	10,546	540	10,006	15.7	12.3	15.9
DECEMBER	M	21,576	715	20,861	17,858	677	17,181	3,718	38	3,680	20.8	5.6	21.4
2nd Quarter		53,783	2,581	51,202	45,184	2,322	42,862	8,599	259	8,340	19	11.2	19.5
Upto 2nd Qtr		99,364	5,651	93,713	85,100	5,073	80,027	14,264	578	13,686	16.8	11.4	17.1
JANUARY	M	17,949	744	17,205	15,068	658	14,410	2,881	86	2,795	19.1	13.1	19.4
	P	117,313	6,395	110,918	100,168	5,731	94,437	17,145	664	16,481	17.1	11.6	17.5
FEBRUARY	M	17,393	759	16,634	14,651	702	13,949	2,742	57	2,685	18.7	8.1	19.2
	P	134,706	7,154	127,552	114,819	6,433	108,386	19,887	721	19,166	17.3	11.2	17.7
MARCH	M	21,634	639	20,995	18,633	246	18,387	3,001	393	2,608	16.1	159.8	14.2
3rd Quarter		56,976	2,142	54,834	48,352	1,606	46,746	8,624	536	8,088	17.8	33.4	17.3
Upto 3rd Qtr		156,340	7,793	148,547	133,452	6,679	126,773	22,888	1,114	21,774	17.2	16.7	17.2
APRIL	M				15,595	932	14,663						
	P				149,047	7,611	141,436						
MAY	M				18,431	730	17,701						
	P				167,478	8,341	159,137						
JUNE	M				25,902	186	25,716						
4th Quarter					59,928	1,848	58,080						
Annual					193,380	8,527	184,853						