

COMAC/ADMIN00150/25
8th June 2025

The Commissioner-General
Ghana Revenue Authority
Accra, Ghana

Dear Sir,

RE: TARIFF INTERPRETATION ORDER ON THE IMPLEMENTATION OF THE ENERGY SECTOR LEVIES ACT, 2025 (ACT 1141)

We write to register our utmost dismay and strong objection to the letter received from your office this morning, Sunday, 8:00 AM, dated Friday, June 6, 2025, a public holiday. The letter demands implementation of the new Energy Sector Shortfall and Debt Repayment Levy (ESSDRL) effective *Monday, 9th June 2025*.

Let us state the facts plainly: this approach is neither lawful nor operationally feasible. It smacks of coercion rather than governance and depicts a military regime. Issuing a backdated directive on a holiday and serving it on a weekend for next-day compliance borders on institutional ambush.

The Chamber leadership met the Hon. Minister for Energy and Green Transition on Thursday, 5th June, to discuss the levy and tabled three practical and necessary demands to mitigate impact. That engagement, it appears, was merely ceremonial, as the concerns raised have been completely disregarded.

Meanwhile, COMAC had already made our position clear in our 4th June press release. The downstream sector is burdened with eight separate taxes and levies, cumulatively representing 22% of the ex-pump price. The ESSDRL increment pushes this to 26%, threatening industry survival, competitiveness, and consumer welfare.

Worse still, the abrupt implementation denies our members, OMCs, the lead time needed to adjust systems, prices, and inventory. How are OMCs, most importantly those on the cash and carry system, to generate funds for a tax they did not anticipate, on stock to be lifted tomorrow?

We therefore wish to state unequivocally: COMAC and its members cannot and will not begin implementation of this levy from Monday, 9th June.

We request a minimum two-week transition period, with a new implementation date of 16th June 2025, to allow industry players to align with this major fiscal change.

This must not be reduced to a technocratic rush to impress. We are industry stakeholders, not bystanders, and we deserve better than Rambo-style directives in the middle of a weekend.

We look forward to an urgent and constructive response.

Yours faithfully,



Dr Riverson Oppong
CEO/Industry Coordinator

CC:

All Deputy Commissioners, Customs
Head, Customs Policy and Programmes Department
All Sector Commanders, Customs
Head, Customs Technical Services Bureau (CTSB)
Head, E-Records
Head, CPA

Managing Director, Ghana Link Network Services Limited
Chief Executive Officer, National Petroleum Authority (NPA)

Hon. Minister of Finance
Deputy Minister of Finance (Revenue)
Director of Budget, MoF

Board Chairman, GRA Governing Board
Commissioner, SSD
Commissioner, DTRD Commandant, Kpetoe Academy
AC, Comm CD Secretariat
Deputy Commissioners, R&S
Board Secretary, BSMS