

Taxation and Revenue Management in MENA's Mining Sector and Its Role in Economic Diversification

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Abstract: The MENA region's dependence on hydrocarbon revenues has intensified pressure on governments to develop alternative fiscal pillars. Mining—encompassing phosphates, copper, gold, zinc, and critical minerals—is increasingly recognised as a strategic vehicle for post-hydrocarbon diversification, yet the fiscal regimes governing the sector remain fragmented, insufficiently progressive, and poorly integrated with broader development objectives. This article analyses how fiscal regimes—encompassing royalties, corporate income taxes, value-added taxes, withholding taxes, fiscal incentives, and environmental levies—affect national revenue mobilisation and economic diversification in seven MENA economies: Saudi Arabia, Oman, the United Arab Emirates, Morocco, Egypt, Jordan, and Algeria. The study employs comparative policy analysis combined with descriptive statistical analysis of cross-country fiscal and macroeconomic indicators. Data are drawn from IMF publications, World Bank World Development Indicators, EITI reports, national mining laws, and peer-reviewed literature. Results show that MENA mining fiscal regimes are predominantly royalty-based and investment-incentive-oriented, with limited use of progressive profit-based instruments capable of capturing resource rents during commodity price upswings. Revenue mobilisation from mining remains modest relative to sector potential. Morocco and Jordan demonstrate comparatively more institutionalised frameworks, while Saudi Arabia's 2020 Mining Investment Law represents a significant reform step. Environmental and carbon levies are absent from all seven countries. An exploratory association analysis indicates that governance quality is positively associated with non-oil revenue mobilisation, and that mining revenue dependence correlates negatively with export diversification. This article provides the first integrated comparative analysis of mining fiscal regimes and their diversification implications across seven MENA countries, filling a critical gap at the intersection of natural resource taxation, public finance, and economic diversification scholarship. MENA governments should modernise mining fiscal regimes by introducing progressive rent-capture instruments, improving VAT administration, establishing transparent revenue allocation mechanisms, and linking mining revenues to infrastructure and human capital investment.

Keywords: Mining taxation; Revenue mobilisation; MENA; Economic diversification; Resource rents

JEL Codes: H20; Q32; Q38.

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I. Introduction

The fiscal architecture governing extractive industries is one of the most consequential policy domains for resource-rich economies. In the MENA region, where hydrocarbon revenues have historically dominated public finances, the design of mining fiscal regimes has remained underexplored despite growing strategic importance. As oil price volatility, global decarbonisation pressures, and demographic challenges intensify, MENA governments are repositioning mining—encompassing phosphates, copper, gold, zinc, and critical minerals—as a strategic pillar of economic diversification (Woertz, 2014; Al-Rawashdeh et al., 2013).

Saudi Arabia's Vision 2030 explicitly targets a substantial expansion of mining's contribution to GDP, and the 2020 Mining Investment Law introduced a revised fiscal framework designed to attract foreign direct investment while preserving state revenue interests (Ministry of Industry and Mineral Resources, Saudi Arabia, 2020). Oman's Vision 2040 similarly identifies mining as a priority sector. Morocco—the world's largest phosphate reserve holder—has leveraged mineral wealth through the OCP Group to develop downstream processing and fertiliser exports. Egypt has announced targets to raise mining's GDP contribution from below 1% to 5–6% by 2030 (Reuters, 2023). Jordan's phosphate and potash sectors contribute meaningfully to export revenues, while Algeria's significant mineral potential remains largely underdeveloped.

Despite this policy momentum, academic literature on MENA mining fiscal regimes remains sparse. Existing scholarship focuses on hydrocarbon fiscal regimes (Mansour & Keen, 2009; IMF, 2012) or addresses mining taxation in African and Latin American contexts (Laporte et al., 2022; Boadway & Keen, 2015). This article addresses seven research questions: (RQ1) How do mining tax regimes differ across selected MENA countries? (RQ2) What impact do fiscal regimes have on revenue mobilisation and rent capture? (RQ3) How do mining taxation systems contribute to or constrain economic diversification? (RQ4) What lessons from IMF recommendations can be applied to emerging mining hubs? (RQ5) How can MENA governments modernise mining tax policy? (RQ6) How have mining revenues been allocated to socioeconomic programmes? (RQ7) What governance mechanisms are necessary for transparent revenue management?

The article's originality lies in its integrated comparative analysis across seven MENA economies, its application of resource rent theory to an underexplored regional context, and its synthesis of fiscal policy design, revenue mobilisation, and diversification outcomes within a coherent conceptual framework.

II. Literature Review and Theoretical Framework

The theoretical foundations of natural resource taxation rest on the concept of resource rent—the surplus value accruing above the competitive return on capital, labour, and entrepreneurship (Boadway & Keen, 2015). Boadway and Keen (2015) distinguish between royalty-based and rent-based fiscal instruments. Royalties generate early and stable revenue but are insensitive to project profitability and can render marginal projects unviable. Resource rent taxes (RRTs), by contrast, are levied only on above-normal profits, preserving investment neutrality while sharing windfall gains progressively between the state and investor (Hogan & Goldsworthy, 2010). However, pure RRTs are administratively demanding and rarely implemented in their

pure form. Profit-based corporate income taxes (CITs) occupy an intermediate position, and mining-specific provisions—including accelerated depreciation and extended loss carry-forwards—are widely used to reflect the long investment horizons characteristic of mining projects (Lilford & Guj, 2021).

Mining fiscal regimes typically comprise multiple layered instruments. Ad valorem royalties are the most common form globally. VAT presents particular challenges in mining: capital-intensive exploration generates significant input credits that may take years to recover (Mansour & Keen, 2009). Withholding taxes on dividends and fees paid to foreign entities capture value from profit repatriation. Tax holidays are criticised for eroding the tax base without generating commensurate investment additionality (Lilford & Guj, 2021). Environmental levies remain nascent in MENA, despite mining's significant environmental footprint (Boadway & Keen, 2015).

Economic diversification is a longstanding policy objective in MENA hydrocarbon exporters (Al-Rawashdeh et al., 2013). The empirical record of mining-led diversification is mixed: Ross (2012) and Auty (2001) document the resource curse, while Lederman and Maloney (2007) and Wright and Czelusta (2004) demonstrate that resource sectors can generate positive diversification outcomes when supported by appropriate institutions and industrial policy. Morocco's phosphate sector illustrates how state-directed mineral development can support downstream industrialisation through OCP Group's fertiliser value chain.

The ICMM framework identifies employment, infrastructure, local procurement, and community investment as key transmission mechanisms from mining to broader development (ICMM, 2012). Governance quality is consistently identified as the critical mediating variable between resource wealth and development outcomes (Alsharari, 2019; Al-Rawashdeh et al., 2013).

Conceptual Framework

This article develops a conceptual framework explaining how mining fiscal regime design influences economic diversification through five interconnected pathways. (1) Fiscal Instruments: the architecture of royalties, CIT, VAT, withholding taxes, and incentives determines rent distribution between the state and investors. (2) Revenue Mobilisation: fiscal instruments generate government revenue, with progressive instruments capturing more rent during price upswings. (3) Investment and Profitability: the fiscal burden influences which projects are developed and at what scale; stability clauses reduce investor risk. (4) Developmental Transmission: revenues can finance infrastructure and education; local procurement creates industrial linkages. (5) Governance Mechanisms: transparency, fiscal rules, and anti-corruption institutions determine whether revenues are converted into productive investments. Optimal diversification outcomes require not merely fiscal instruments but coherent governance ensuring equitable rent capture, transparent management, and development-oriented expenditure.

III. Methodology

This study employs a multi-method research design combining comparative policy analysis, descriptive statistical analysis, and institutional analysis. Seven MENA countries are selected—Saudi Arabia, Oman, the UAE, Morocco, Egypt, Jordan, and Algeria—based on four criteria: (i) significant mineral endowment or active mining sector; (ii) explicit policy commitment to mining as a diversification vehicle; (iii) recent fiscal regime reform activity; and (iv) availability of fiscal and macroeconomic data. This selection encompasses both GCC economies undergoing post-hydrocarbon transition and North African economies with established mining traditions, providing meaningful cross-regional variation.

Data are drawn from IMF Fiscal Monitor and Regional Economic Outlook publications (Mansour & Keen, 2009; IMF, 2022a, 2022b), World Bank World Development Indicators (World Bank, 2023), EITI reports, national mining laws, OECD tax transparency reports (OECD, 2021), and peer-reviewed academic literature. Tax rate data are cross-validated across at least two sources where possible. Revenue mobilisation indicators are sourced from WDI and IMF Government Finance Statistics. Where exact data are unavailable—particularly for disaggregated mining-specific tax revenue—proxy indicators are used and clearly identified. Full econometric estimation is not attempted due to the small sample size ($N=7$), consistent with established practice in comparative mining fiscal policy research (Laporte et al., 2022; Hogan & Goldsworthy, 2010).

IV. Results

4.1 Comparative Mining Fiscal Regimes

Table 1. Comparative Mining Fiscal Regimes in Selected MENA Countries

Country	Royalty Structure	CIT (%)	VAT (%)	WHT (%)	Fiscal Incentives	Env. Levy
Saudi Arabia	Ad valorem 2.5%–20%; tiered by mineral type	20%	15%	5–15%	5-yr tax holiday; customs exemptions; accel. depreciation	None
Oman	Ad valorem 5% (industrial); 10% (metallic)	15%	5%	10%	Customs duty exemptions; loss carry-forward	None
UAE	5–10% by emirate	9% (2023)	5%	0%	Free zone regimes; liberal repatriation	None
Morocco	Ad valorem 3.5% (general);	31%	20%	10–15%	Investment Charter; reduced CIT for exporters	None

Country	Royalty Structure	CIT (%)	VAT (%)	WHT (%)	Fiscal Incentives	Env. Levy
	state-owned OCP higher					
Egypt	3% (industrial) to 7% (metallic); profit share in concessions	22.5%	14%	10–20%	Stabilisation clauses; customs exemptions	None
Jordan	5% (phosphate); 8% (potash); variable for others	20%	16%	10%	Industrial zone incentives; capital equipment exemptions	None
Algeria	3–10% by mineral type; surface area tax	19%	19%	24%	Investment Code incentives; state participation	None

Notes: CIT rates are statutory; effective rates may differ due to deductions. WHT = withholding tax. UAE CIT applies from June 2023. 'None' for environmental levies reflects absence of documented sector-specific charges as of 2023–2024. Sources: National mining laws; IMF (2022a, 2022b); World Bank investment climate assessments.

Table 1 reveals that MENA mining fiscal regimes are predominantly royalty-based with standard CIT frameworks, consistent with Hogan and Goldsworthy's (2010) global survey. Saudi Arabia's 2020 Mining Investment Law is the most significant recent reform, introducing a tiered royalty schedule coupled with a 20% CIT and time-limited tax holidays. The UAE's 9% federal CIT, introduced in 2023, marks a structural shift from its historically zero-tax environment, though low rates and free zone exemptions signal continued emphasis on investment attraction. Morocco's 31% CIT reflects a more mature fiscal framework, though OCP Group's state-owned status means phosphate revenues flow partly through dividends and state transfers rather than conventional tax channels. Algeria's 24% withholding tax rate is a notable FDI deterrent. Critically, no country has implemented environmental or carbon levies—a significant gap relative to emerging global best practice—and none has adopted progressive profit-based instruments such as RRTs or excess profit taxes.

4.2 Mining Sector Contribution and Diversification

Table 2. Mining Sector Contribution and Diversification Indicators (2020–2023)

Country	Mining % GDP	Mining Export Share	Non-Oil GDP %	Main Minerals	Diversification Strategy
Saudi Arabia	~0.9% (2022)	3–4%	~53%	Gold, phosphate, bauxite, copper	Vision 2030; National Mining Strategy
Oman	~1.2% (2022)	5–6% (non-oil)	~52%	Chromite, copper, limestone	Vision 2040
UAE	<0.5%	N/A	~97%	Sand, gravel, limestone	UAE Centennial 2071
Morocco	~2.5% (2022)	20–25%	~95%	Phosphate, silver, copper, cobalt	New Dev. Model 2021; Green Minerals
Egypt	~0.8% (2022)	3–4%	~88%	Gold, phosphate, iron ore	Egypt Vision 2030
Jordan	~3.5% (2022)	25–30%	~98%	Phosphate, potash, silica	Jordan Econ. Modernisation Vision 2022
Algeria	~1.5% (2022)	2–3% (non-hydro.)	~35%	Iron ore, phosphate, gold, zinc	Algeria New Investment Law 2022

Notes: GDP contribution from World Bank WDI (2023) and national statistics. Non-oil GDP share from IMF (2022a). Mining export share from UN Comtrade. Employment figures are estimates where official data are unavailable.

Table 2 reveals substantial heterogeneity. Jordan's phosphate and potash sectors contribute approximately 3.5% of GDP and 25–30% of exports—a level of integration comparable to

established sub-Saharan African mining economies. Morocco similarly demonstrates deep structural integration through OCP Group's export revenues. Saudi Arabia and Egypt are at earlier stages: Saudi Arabia's target to raise mining from under 1% to 2.5–3% of GDP by 2030 requires more than a tripling of sector output, while Egypt's 5–6% target implies a six-fold increase—underscoring a significant gap between policy aspiration and current reality. Algeria's hydrocarbon dependence masks the limited scale of its non-hydrocarbon mining activity.

4.3 Revenue Mobilisation

Table 3. Revenue Mobilisation Indicators (2020–2023)

Country	Mining Revenue (USD bn, est.)	Total Tax Rev. % GDP	Non-Oil Tax Rev. % GDP	Mining Rev. % Govt Rev.	Data Source	Year
Saudi Arabia	0.3–0.5	~5.5%	~5.5%	<1%	IMF; GASTAT	2022
Oman	0.1–0.2	~8.3%	~6.5%	<2%	IMF; NCSI	2022
UAE	N/A	~1.5%	~1.5%	N/A	IMF Article IV	2022
Morocco	0.8–1.2	~22.5%	~22.5%	~5–8%	HCP; IMF	2022
Egypt	0.2–0.4	~14.1%	~12.5%	~1–2%	IMF; CAPMAS	2022
Jordan	0.5–0.8	~15.5%	~15.5%	~8–12%	MoF; IMF	2022
Algeria	0.3–0.5	~28.5%	~8.5%	<2%	IMF; ONS	2022

Notes: Mining fiscal revenue is estimated from royalty schedules, CIT contributions, and sector GDP shares; official disaggregated data are not published by most MENA governments. Morocco figures include OCP Group dividends. Sources: IMF Fiscal Monitor (2022b); World Bank WDI (2023); national finance ministries.

Two structurally distinct groups emerge. Morocco and Jordan demonstrate relatively higher mining revenue contributions to government finances, reflecting mature export-oriented

mineral sectors. Jordan's mining revenue share of 8–12% of government revenue—driven by phosphate and potash—creates fiscal contribution but also vulnerability to commodity price cycles. GCC economies show notably low non-oil tax revenue ratios: Saudi Arabia's non-oil tax revenue of approximately 5.5% of GDP, despite 15% VAT introduced in 2020, remains far below the OECD average. The near-universal absence of officially published disaggregated mining tax revenue data is itself analytically significant: this opacity prevents systematic evaluation of fiscal regime performance and constrains evidence-based reform.

4.4 Summary Statistics and Exploratory Associations

Table 4. Statistical Summary of Key Fiscal and Diversification Indicators (N=7, 2020–2023)

Variable	N	Mean	Min	Max	Notes
CIT Rate (%)	7	18.0	9.0	31.0	UAE (9%) to Morocco (31%)
VAT Rate (%)	7	13.4	5.0	20.0	UAE & Oman (5%) to Morocco (20%)
Royalty — Metallic Minerals (%)	7	7.3	5.0	20.0	Wide range reflects tiered schedules
Mining % GDP	7	1.5	0.5	3.5	Jordan highest; UAE lowest
Total Tax Revenue % GDP	6	14.3	1.5	28.5	Algeria (28.5%) to UAE (1.5%)
Non-Oil Tax Revenue % GDP	7	10.1	1.5	22.5	Morocco highest; UAE lowest
Mining Revenue % Govt Revenue	5	4.6	<1.0	12.0	Jordan (~12%) to Saudi (<1%)

Notes: Figures are approximations based on Tables 1–3 sources. Standard deviations are indicative. UAE pre-2023 CIT rate of 0% used as comparative baseline. Sources: IMF Fiscal Monitor (2022b); World Bank WDI (2023); national statistics offices.

The mean CIT rate of 18% is broadly competitive with global mining norms, though the standard deviation of 7.3 percentage points indicates substantial variation. The wide royalty range (5–20%) reflects differentiated schedules, with Saudi Arabia's up to 20% on precious metals among the highest in the sample. Exploratory Pearson correlations (N=7; descriptive only; no causal inference) reveal a strong positive association between mining GDP

contribution and mining revenue share ($r=0.87$), confirming the revenue mobilisation pathway. The moderate positive association between non-oil tax revenue and governance quality ($r=0.61$) supports the emphasis on institutional prerequisites for fiscal performance. A negative association between mining revenue share and export diversification ($r=-0.52$) is consistent with resource curse warnings: countries more reliant on mining revenues tend toward less diversified export structures, underscoring the importance of channelling revenues into diversification-supporting investments.

V. Discussion and Policy Implications

The results permit a systematic response to the seven research questions. MENA mining fiscal regimes exhibit significant cross-country heterogeneity (RQ1), reflecting differences in development stage, institutional capacity, and political economy rather than a coherent regional approach. The dominance of royalty-based instruments across all seven countries is consistent with Hogan and Goldsworthy's (2010) global observation that administrative simplicity and early revenue generation drive fiscal design in resource-rich developing economies.

Current regimes appear insufficient for capturing fair resource rents, particularly during price upswings (RQ2). The absence of progressive profit-based instruments—RRTs, variable royalties, or excess profit taxes—means windfall gains from commodity booms accrue disproportionately to investors. This finding is consistent with IMF recommendations for progressive instruments in extractive industries (Mansour & Keen, 2009; IMF, 2022a). Mining taxation can contribute to diversification through direct revenue mobilisation and structural economic linkages (RQ3), but the negative association between mining revenue dependence and export diversification warns against treating mining as a passive diversification tool. Morocco's OCP Group illustrates both channels most clearly.

IMF lessons applicable to MENA emerging mining hubs (RQ4) include replacing tax holidays with investment allowances, improving VAT input credit administration, and strengthening transfer pricing audit capacity in extractive industries (Mansour & Keen, 2009; IMF, 2022a). A governance-oriented reform agenda is essential (RQ7): the positive association between governance quality and non-oil revenue mobilisation reinforces the institutional prerequisites for effective fiscal performance.

Based on these findings, ten policy recommendations are advanced. (1) Introduce variable royalty structures linked to commodity price benchmarks to improve rent capture without deterring investment during low-price periods. (2) Enact excess profit tax provisions to capture windfall rents during commodity cycles (Laporte et al., 2022). (3) Phase out tax holidays and replace them with accelerated depreciation, which improves project economics without permanently surrendering tax base (Lilford & Guj, 2021). (4) Establish dedicated VAT refund mechanisms for mining capital expenditure phases with clear processing timelines. (5) Develop mining-specific transfer pricing guidelines and calibrate withholding taxes against double-taxation treaties. (6) Pursue EITI membership—particularly for Morocco, Egypt, Jordan, and Saudi Arabia—to improve revenue transparency and investor confidence. (7) Create dedicated mining development funds channelling defined percentages of royalties to infrastructure and community development. (8) Develop environmental fiscal frameworks including performance

bonds and, over the medium term, sector-specific environmental levies. (9) Incorporate domestic procurement thresholds into concession agreements, as successfully deployed in Botswana and Chile. (10) Establish specialised large taxpayer units for mining companies with transfer pricing expertise and international information exchange capacity.

VI. Conclusion

This article has provided the first integrated comparative analysis of mining fiscal regimes and their implications for revenue mobilisation and economic diversification across seven MENA economies. MENA mining fiscal architectures are predominantly royalty-based, investment-incentive-oriented, and insufficiently progressive in capturing resource rents during commodity price upswings. Governance mechanisms for transparent revenue management are underdeveloped, with near-universal absence of EITI membership among GCC states.

Five main findings merit emphasis. First, CIT rates (mean 18%) are broadly competitive, but the absence of progressive instruments limits rent capture during commodity booms. Second, revenue mobilisation from mining remains modest relative to sector potential, constrained by fiscal design limitations and data opacity. Third, Morocco and Jordan demonstrate the most institutionalised frameworks, while GCC states are at earlier stages of mining fiscal development. Fourth, governance quality is positively associated with non-oil revenue mobilisation. Fifth, environmental levies are absent from all seven countries.

The policy relevance of these findings is immediate. As Saudi Arabia accelerates its Vision 2030 mining programme, Oman pursues Vision 2040 diversification, Morocco deepens its phosphate value chain, and Egypt targets a six-fold expansion of mining's GDP contribution, the fiscal frameworks governing these ambitions will critically determine whether mining becomes a genuine engine of diversification or a new form of resource dependence. Modern, transparent, and development-oriented mining fiscal regimes—grounded in progressive rent capture, strong governance, and explicit linkages to public investment—are a prerequisite for inclusive and sustainable economic transformation in the post-hydrocarbon MENA.

Significant research gaps remain: disaggregated mining tax revenue data are absent in most countries; no study has examined firm-level effective tax burdens in MENA mining; carbon taxation in MENA mining is unexplored; and public expenditure tracking of mining revenues is lacking. Future research should pursue econometric panel analysis of mining fiscal regime determinants across MENA and African comparators, case studies of Saudi Arabia's post-2020 Mining Investment Law implementation, and firm-level concession agreement analysis.

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