

Synopsis

Tax today

March 2020



A monthly journal, published by PwC South Africa, that gives informed commentary on current developments in the tax arena, both locally and internationally.

Through analysis of and comment on new laws and judicial decisions of interest, Synopsis helps executives to identify developments and trends in tax law and revenue practice that may affect their business.

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SARS Watch: Linda Mathatho

'Tax as a strategic asset' series

Topic 3: COVID-19

Considerations for tax functions

The global outbreak of COVID-19 is greatly impacting businesses, families, communities and governments, and the situation is evolving constantly. At PwC, what we do know is that we're guided by our values of caring about our clients and our people, making a difference, working together to solve important problems, and reimagining the possible – all while acting with the utmost integrity. Every organisation is facing unprecedented challenges to business operations. In times like this, the tax function needs to quickly and effectively respond to these impacts.

In response to the COVID-19 pandemic, it's key to assess how agile a tax function is, and where improvements must be made to deal with the unexpected challenges.

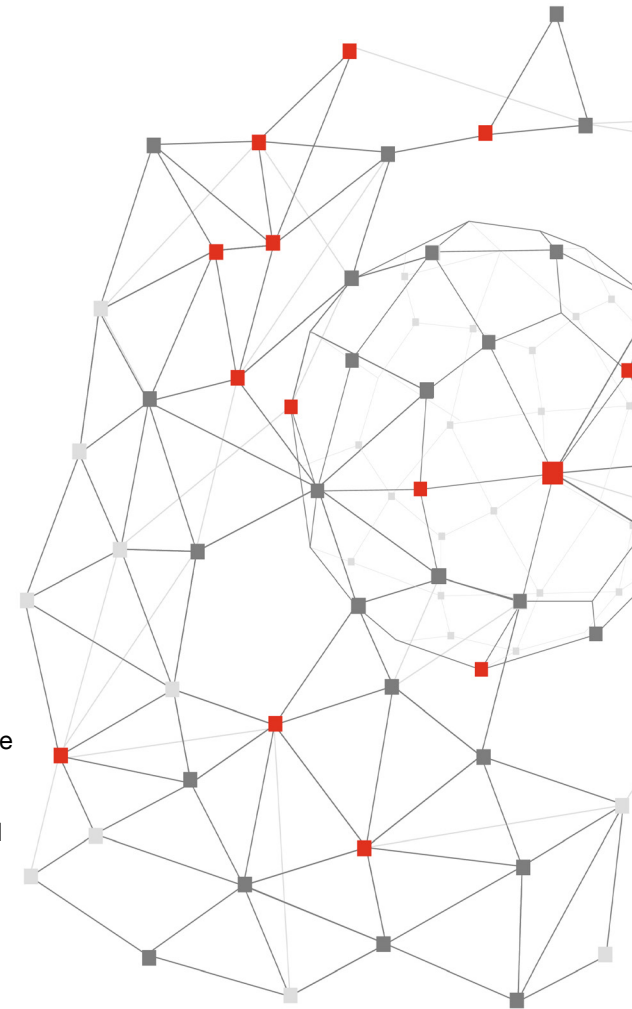
A coordinated response is required to the following key points:

1. Understand the short-term and long-term impacts of COVID-19 on the tax operating model.
2. The tax workforce (and supporting business functions) will in all likelihood be working remotely. Can they communicate effectively, access and share data and information as required and continue to operate within a robust tax governance and control framework?
3. Identify potential points of failure:
 - a. Who are the teams and individuals on whom critical tax processes or business partnering depend?
 - b. Is the business considering alternatives where it's not possible to hold or attend physical internal and external meetings or training? To what extent is technology used to collaborate, consult and learn remotely?

4. There's an obligation to report on potential tax risks arising from COVID-19, or its impact. Has the tax impact on the business been considered (e.g. its compliance and reporting obligations, cash impact, reputation etc.)?
5. Data is at the heart of the delivery model in tax. In this time of virtual offices, has the organisation considered financial and tax data security and confidentiality?

Have a clear vision of direction, and be prepared to flex your muscles to make it happen

Now is the right moment, considering the developing situation, to review the organisation's long-term tax function strategy, redefine its desired end-state and determine where to invest to facilitate accelerated growth. Set clear strategic priorities based on business values and revisit existing strategy, considering legal and reputational risks.



Crisis planning

From our experience, a strongly developed crisis response capability is required. This will ensure the efficient management of incidents, minimise associated negative impacts on the business, meet compliance requirements, and ensure the continued delivery of critical support to the business. Many businesses have these plans in place for the workplace and supply chain, but COVID-19 has already unveiled flaws in some.

The ability to do scenario planning is critical. What are the best- and worst-case scenarios, and is the business equipped to cope? Consider the longer-term impact. Interrogate data. Ask searching questions of the tax team to highlight critical sensitivities, potential unexpected cost and exposure.

Bringing strategic value to the organisation

Now more than ever, the use of automated tools and technology to collaborate in real time, and collate, analyse, and report on tax and information, is required to enable the tax function to operate effectively. This also enable resources to be redirected to more critical activities. From a tax director's point of view, a simple and operational approach to tax risk is required, with clear visualisation and analysis that can be used to report to relevant stakeholders, and to prioritise the mitigation of risk and align resources in the most effective manner.

PwC is committed to working alongside our clients to tackle the challenges faced by the tax function in responding to COVID-19.

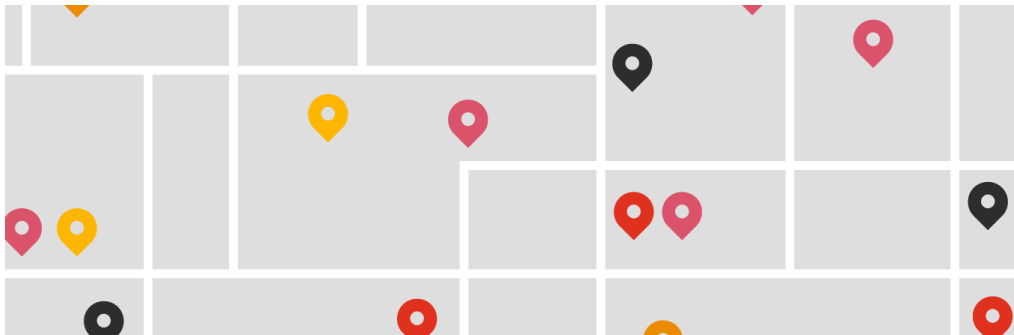
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Fund safe harbours in South Africa remain very much in point



In brief

COVID-19 presents significant challenges to people and investment funds around the globe and the disruption continues to evolve. Where key decision makers are located in South Africa, ongoing investment committee and other decision-making activities of funds enjoying the South African safe harbour protections may continue without triggering adverse South African tax consequences for the fund and its investors. It follows that these safe harbour rules remain very much in point. Existing traditional investment fund structures can also be refined to fall within this safe harbour.

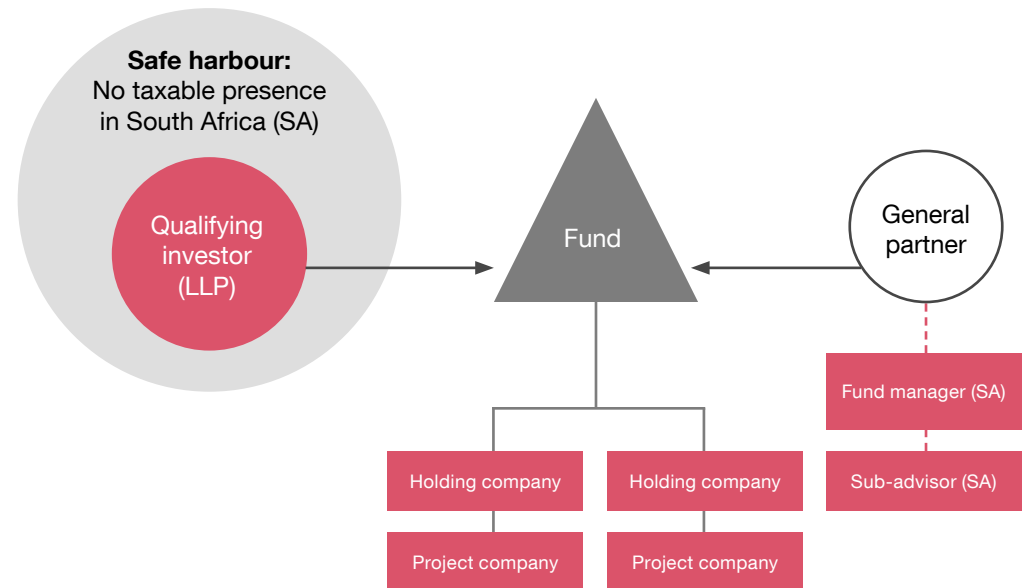
In detail

Traditionally, investment managers have ensured that funds and their investors are not exposed to adverse tax residence or permanent establishment risks in one of two ways.

Firstly, by implementing guardrails / 'do's and don'ts' in respect of investment committee and sub-advisor activities. These guardrails require the decision-making activities to take place from specific locations.

Secondly, South African domestic tax law contains safe harbour rules available for funds where fund managers located in South Africa which, for many foreign funds, remove the fund and its foreign investors completely from the South African tax net.

For example, a limited liability partnership may have a South African general partner and have the fund managed from South Africa, without triggering a South African permanent establishment for any of its foreign investors, provided that the limited partners are all passive investors and do not have any management responsibility or contractual authority. Existing traditional investment fund structures can also be refined to fall within this safe harbour.



The rule also covers funds operating in the form of trusts and entities that are fiscally transparent – that is, the entity is not subject to income tax but rather the individual members/partners are taxed on a look-through basis.

Exchange control relaxations

Favourable exchange control rules apply to South African-domiciled private equity funds.

Private equity funds that are members of the South African Venture Capital Association, mandated to invest outside the Common Monetary Area (i.e. Lesotho, Namibia, South Africa and Swaziland) may apply to the Financial Surveillance Department for approval to invest offshore.

The above approval is obtained upfront and provides investors with the required certainty from a currency control perspective.

The takeaway

The traditional way of ensuring that funds and their investors are not exposed to adverse risks by locating decision-making activities in specific locations is under pressure globally. It follows that funds should make use of South Africa's domestic safe harbour rules to ensure that the 'handcuffs' are taken off and key decision makers can continue with their investment activities when they are present in South Africa.



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Taxpayers take note: You could be held personally liable for the tax debts of another taxpayer

Considering the rapidly deteriorating economic climate that taxpayers find themselves in, it is important to note that, in certain circumstances, the South African Revenue Service (SARS) has the right to hold taxpayers personally liable for the tax debts of other taxpayers.



Section 184 of the Tax Administration Act, No. 28 of 2011 (TAA), gives SARS the power to recover tax debts from, *inter alia*, a representative taxpayer as well as from a withholding agent, as if they themselves were the taxpayer. In turn, the representative taxpayer/withholding agent has the same rights and remedies as the taxpayer would have had against SARS. However, SARS is obliged to first provide notice to the representative taxpayer/withholding agent which it intends to hold personally liable for the taxpayer's tax debt.

The recent High Court case of *K Siphayi v SARS* (case number 34975/2019) dealt with circumstances where Mr Siphayi was held personally liable for a tax debt of about R14 million owed by Kenny Bricks CC, in which Mr Siphayi was the sole member.

SARS attempted to deduct funds from Mr Siphayi's bank account in respect of the tax debt owing by Kenny Bricks CC.

The applicants, Mr Siphayi and Kenny Bricks CC, approached the High Court in order to obtain an urgent interdict preventing SARS from deducting the tax debt from the bank account of Mr Siphayi.

Mr Siphayi alleged that the urgency of the matter lay in the fact that if the tax debt of Kenny Bricks CC was deducted from the bank account of Mr Siphayi, then he would be severely affected in his ability to conduct his business.

Being satisfied that the matter was in fact urgent, the court went on to consider the merits of the matter.

SARS contended that the required notices in terms of the TAA were sent to Mr Siphayi via email and they were also posted to a physical address via registered mail. The emails were sent on 7 June 2019 and 6 August 2019 respectively, but nothing further was said as to whether these emails were delivered or not. In respect of the registered mail, the tracking notes reflected that they were returned because the registered letters were not collected at the post office.

Mr Siphayi contended that he did not receive the notices on 7 June 2019 and 6 August 2019. Had he received them he would have acted upon them and made the relevant representations as requested in the notices. It was contended further for the applicant that:

[9] ... Section 253 (1) [of the TAA] provides that a notice, document or other communication issued, given, sent or served in the manner referred to in section 251 or 252, is regarded as received by the person to whom it was delivered or left, or if posted it is regarded as having been received by the person to whom it was addressed at the time when it would, in the ordinary course of post, have arrived at the a addressed place. Subsection (1) does not apply if— (a) SARS is satisfied that the notice, document or other communication was not received or was received at some other time; or - (b) a court decides that the notice, document or other communication was not received or was received at some other time.

[10] ... if SARS is satisfied that a notice, document or other communication (other than a notice of assessment) issued, given, sent or served in a manner referred to in section 251 or 252 (excluding paragraphs (a) and (b) thereof) – (i) has not been received by the addressee; or – (ii) has been received by that person considerably later than it should have been received; and the person has in consequence been placed at a material disadvantage, the notice, document or other communication must be withdrawn and be issued, given, sent or served anew.

The court ordered that SARS and the Commissioner for SARS were interdicted from deducting monies from the Mr Siphayi's bank account in terms of section 184 of the TAA. In addition, SARS was ordered to resend the notices of intention to hold Mr Siphayi liable for the tax debts of Kenny Bricks CC.

The takeaway:

Taxpayers can be held liable for the tax debts of another person.

If SARS seeks to hold another person liable for the tax debts of the taxpayer, due process must be followed. In particular, the correct methods of service of notices as envisaged in the TAA must be followed and taxpayers must be afforded the opportunity to make representations before they are held liable for the tax debt of another taxpayer.



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SARS Watch

26 February 2020 – 31 March 2020

Legislation		
30 Mar 2020	Amendment to Part 1 of Schedule No. 2, by the insertion of item 206.01/2836.20/04.06, to implement anti-dumping duties on Disodium Carbonate (Soda Ash) Originating in or imported from the United States of America – ITCA Report No. 616	Notice R. 427 published in Government Gazette No. 43179 with an implementation date of 30 March 2020.
30 Mar 2020	Amendment to Part 1 of Schedule No. 1, by the substitution of tariff subheading 8450.11 and the insertion of tariff subheadings 8450.11.10 and 8450.11.90, in order to increase the rate of customs duty on fully-automatic top-loading washing machines from free of duty to 30% – ITAC Report No. 609	Notice R. 426 published in Government Gazette No. 43179 with an implementation date of 30 March 2020.
30 Mar 2020	Amendment to Part 1 of Schedule No. 1, by the substitution of tariff subheadings 3907.61.10 and 3907.69.10 from free of duty and tariff subheadings 3907.61.90 and 3907.69.90 from 10% respectively, in order to increase the rate of customs duty on polyethylene terephthalate (PET) to 15% – ITAC Report No. 610	Notice R. 425 published in Government Gazette No. 43179 with an implementation date of 30 March 2020.
29 Mar 2020	Explanatory Notes on COVID 19 Tax measures	The note explains the exceptional tax measures forming part of the fiscal package outlined by President Cyril Ramaphosa on 23 March 2020 in his speech on the Escalation of Measures to Combat COVID-19.
26 Mar 2020	UIF Temporary Employee Relief Scheme	Notice 215 published in Government Gazette No. 43161 with a commencement date of 26 March 2020.
26 Mar 2020	UIF relief for clothing sector	Notice 403 published in Government Gazette No. 43152 with an effective date of 27 March 2020 and for the period ending 28 February 2022.
26 Mar 2020	Amendment to Part 3A of Schedule No. 1, by an increase of 13c/bag in the rate of environmental levy on plastic bags from 12c/bag to 25c/bag, to give effect to the Budget proposals announced by the Minister of Finance on 26 February 2020	Notice R. 405 published in Government Gazette No. 43156 with effect from 1 April 2020.
26 Mar 2020	Amendment to Part 3C of Schedule No. 1, by an increase of R2/lamp in the rate of environmental levy on incandescent light bulbs from R8.00 to R10.00 per lamp, to give effect to the Budget proposals announced by the Minister of Finance on 26 February 2020	Notice R. 409 published in Government Gazette No. 43156 with effect from 1 April 2020.
26 Mar 2020	Amendment to Part 3D of Schedule No. 1, by an increase in emissions tax on passenger vehicles from R110 to R120 for every gram of CO2 emission per kilometre and, in the case of double cabs, from R150 to R160 for every gram of CO2 emission per kilometre in excess of 175g CO2/km. The threshold on passenger vehicles is also adjusted from 120g CO2/km to 95g CO2/km to give effect to the Budget proposals announced by the Minister of Finance on 26 February 2020	Notice R. 408 published in Government Gazette No. 43156 with effect from 1 April 2020.
26 Mar 2020	Amendment to Part 5A of Schedule No. 1, by an increase of 16c/li in the rate of the general fuel levy from 361c/li to 377c/li and 347c/li to 363c/li on petrol and diesel respectively, to give effect to the Budget proposals announced by the Minister of Finance on 26 February 2020	Notice R. 406 published in Government Gazette No. 43156 with effect from 1 April 2020.
26 Mar 2020	Amendment to Part 5B of Schedule No. 1, by an increase of 9c/li in the RAF levy from 198c/li to 207c/li on both petrol and diesel to give effect, to the Budget proposals announced by the Minister of Finance on 26 February 2020	Notice R. 407 published in Government Gazette No. 43156 with effect from 1 April 2020.

26 Mar 2020	Amendment to Part 3 of Schedule No. 6, as a consequence to the increase in the fuel and RAF levy, as announced by the Minister of Finance in his budget speech of 26 February 2020, the diesel refund provisions are adjusted accordingly	Notice R. 410 published in Government Gazette No. 43156 with effect from 1 April 2020.
26 Mar 2020	Amendment to Part 1D of Schedule No. 6	Notice R. 411 published in Government Gazette No. 43156 with an implementation date of 26 March 2020.
6 Mar 2020	Table B: Average Exchange Rates,	Average monthly exchange rates as February 2020.
6 Mar 2020	Table A: Average Exchange Rates, 6 Mar 20	Average exchange rates for a year of assessments up to February 2020.
6 Mar 2020	Rate per kilometre in respect of motor vehicles	Notice 271 published in Government Gazette 43073 with an implementation date of 1 March 2020.
6 Mar 2020	Daily amount in respect of meals and incidental costs	Notice 270 published in Government Gazette No. 43073 with an implementation date of 1 March 2020.
4 Mar 2020	Table 1: Interest rates on outstanding taxes and interest rates payable on certain refunds of tax	Effective from 1 May 2020, the interest rate will be 9,75%.
4 Mar 2020	Table 2: Interest rates payable on credit amounts	Effective from 1 May 2020, the interest rate will be 5,75%.
3 Mar 2020	Draft rule amendments – Rules relating to excise	Comments must be submitted to SARS by Tuesday, 17 March 2020.
2 Mar 2020	Amendment to Part 1 of Schedule No. 1 by the substitution of tariff subheadings 1001.91 and 1001.99 as well as 1101.00.10, 1101.00.20 1101.00.30 and 1101.00.90 to reduce the rate of customs duty on wheat and wheaten flour from 77.62c/kg and 116.44c/kg to 51.66c/kg and 77.49c/kg respectively, in terms of the existing variable tariff formula – Minute 13/2019	Notice R237 published in Government Gazette No.43061 with an implementation date of 2 March 2020.
2 Mar 2020	Amendment of Part 1 of Schedule No. 1, by the substitution of tariff subheadings 1701.12, 1701.13, 1701.14, 1701.91, and 1701.99 to reduce the rate of customs duty on sugar from 476.61c/kg to 418.61c/kg in terms of the existing variable tariff formula – Minute M12/2019	Notice R. 238 published in Government Gazette No. 43061 with an implementation date of 2 March 2020.
28 Feb 2020	Amendment to Part 1 of Schedule No. 4, by the substitution of rebate item 412.09/00.00/01.00, to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 230 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 4 of Schedule No. 4, by the substitution of rebate item 495.00/00.00/01.00, to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 228 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 5 of Schedule No. 4, by the substitution of rebate item 497.01/00.00/01.00, to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 229 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 1G of Schedule No. 6, by the substitution of rebate item 624.50/000.00.00/0100 to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 231 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 2 of Schedule No. 6, by the substitution of rebate item 634.03/000.00.00/01.00, to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 227 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.

28 Feb 2020	Amendment to Part 3 of Schedule No. 6, by the substitution of rebate item 670.10/00.00/01.00 to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 234 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 4 of Schedule No. 6, by the substitution of rebate item 680.02/00.00/02.00 to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 233 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to Part 5 of Schedule No. 6, by the substitution of rebate item 690.01/00.00/01.00 to exclude duty rebates or refunds in circumstances where damage, destruction or loss of goods as contemplated in those items occurs due to robbery or theft	Notice R. 232 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
28 Feb 2020	Amendment to item no. 412.09/00.00/01.00 in paragraph 8 of Schedule 1 to the Value-Added Tax Act, 1991 (Act No. 89 of 1991), as a consequence of the amendment to rebate item 412.09/00.00/01.00 in Part 1 of Schedule No. 4 to the Customs and Excise Act, 1964 (Act No. 91 of 1964)	Notice R. 226 published in Government Gazette No. 43051 with an implementation date of 28 February 2020.
Case law		
<i>In accordance with date of judgment</i>		
25 Mar 2020	CSARS v United Manganese of Kalahari (Pty) Ltd	Royalty calculation based on gross sales determined in terms of section 6(2)(b), read with section 6(3)(b) of the Royalty Act.
25 Mar 2020	Telkom SA SOC Limited v The Commissioner for the South African Revenue Service	Whether R3.9 billion foreign exchange loss and a R136 million incentive bonus were deductible for tax.
23 Mar 2020	Commissioner of the South African Revenue Service v Public Protector and Others	Whether the Public Protector's subpoena powers claim superiority over the confidential status of taxpayer information under the Tax Administration Act.
27 Mar 2019	Canyon Resources (Pty) Ltd v CSARS	Interpretation of post-recovery and post-mining activities.
Interpretation notes		
30 Mar 2020	IN 99 (Issue 3) – Unclaimed benefits	This Note explains the treatment of lump sum benefits classified as unclaimed benefits that accrued to members (both before and from 1 March 2009) for income tax purposes.
24 Mar 2020	IN 47 (Issue 4) – Wear-and-tear or depreciation allowance	This note provides guidance on the circumstances in which the wear-and-tear or depreciation allowance in section 11(e) may be claimed as a deduction.
24 Mar 2020	Draft Interpretation Note – Associations: Funding requirement	Comments must be submitted to SARS by Thursday, 30 April 2020.
18 Mar 2020	Draft Interpretation Note – Withholding tax on royalties	Comments must be submitted to SARS by Friday, 29 May 2020.
18 Mar 2020	Draft Interpretation Note – Withholding tax on interest	Comments must be submitted to SARS by Friday, 29 May 2020.
18 Mar 2020	IN 53 (Issue 3) – Limitation of allowances granted to lessors of affected assets	This Note provides clarity and guidance on the application of section 23A, which ringfences specified capital allowances granted to a lessor for certain aircraft, ships, machinery, plant, implements, utensils and articles ('affected assets').
3 Mar 2020	IN 113 – Apportionment of surplus and minimum benefit requirements: Pension Funds Second Amendment Act	This Note provides clarity on the tax treatment of the actuarial surplus allocations or distributions made to members, former members, existing pensioners and employers by funds under the provisions of sections 15B, 15C, 15D or 15E of the Pension Funds Act.
Rulings		
26 Mar 2020	BGR 52 – Timeframe for the export of goods by vendors and qualifying purchasers affected by COVID 19	This BGR extends to the following export movable goods and obtaining the relevant documentary proof of export stipulated in the Export Regulations and IN 30 respectively.
24 Mar 2020	BGR 7 (Issue 3) – Wear-and-tear or depreciation allowance	This BGR reproduces the parts of Interpretation Note 47 (Issue 4) 'Wear-and-Tear or Depreciation Allowance' dated 24 March 2020 that comprise a BGR under section 89 of the Tax Administration Act.

24 Mar v	BGR 14 (Issue 3) – VAT treatment of specific supplies in the short-term insurance industry	This BGR sets out the VAT treatment of specific issues in the short-term insurance industry.
National Treasury		
23 Mar 2020	National Treasury COVID-19 email address	The public can share suggestions and ideas around how all South Africans can work together to overcome the virus by sending emails to the following address created by National Treasury COVID-19@treasury.gov.za .
11 Mar 2020	Media Advisory – Invitation to a Stakeholder Workshop on the Taxation and Regulation of Electronic Cigarettes	National Treasury will be hosting a workshop on e-cigarettes on Wednesday, 25 March 2020. The workshop was cancelled due to the president's national state of disaster declaration on 15 March 2020.
10 Mar 2020	Media Advisory – Accreditation Process Publication of the proposal on export taxes on scrap metal for public comment	The statement contains National Treasury's consultation approach and comments are due on Thursday, 9 April 2020. The workshop was cancelled due to the president's national state of disaster declaration on 15 March 2020.
Guides and forms		
20 Mar 2020	Dispute Resolution Guide: Guide on the Rules Promulgated in terms of Section 103 of the Tax Administration Act, 2011 (Issue 2),	This is a general guide dealing with the resolution of tax disputes in South Africa. It is an introductory guide and does not deal with all the legal detail associated with dispute resolution.
20 Mar 2020	Guide on Mutual Agreement Procedures (Issue 3)	This is a general guidance on the mutual agreement procedure (MAP) that allows competent authorities from the governments of contracting jurisdictions to interact with the intent to resolve international tax disputes.
18 Mar 2020	Basic Guide to Section 18A Approval	This guide has been prepared to assist organisations in understanding the basic requirements for obtaining and retaining approval under section 18A.
17 Mar 2020	Frequently Asked Questions: Foreign Employment Income Exemption (Issue 3)	The FAQs are drafted purely to assist employees, employers and the public at large to obtain clarity and to ensure consistency on certain practical and technical aspects relating to the amendment.
11 Mar 2020	ABC of Capital Gains Tax for Companies (Issue 9)	This guide provides a basic introduction to capital gains tax.
11 Mar 2020	ABC of Capital Gains Tax for Individuals (Issue 11)	This guide provides a simple introduction to capital gains tax (CGT) at its most basic level and probably contains insufficient detail to enable you to accurately determine your liability for CGT under most practical situations and applies to the 2020 year of assessment which covers the period 1 March 2019 to 29 February 2020.
Other publications		
31 Mar 2020	COVID-19 Tax Alert – Exceptional Tax Measures	The purpose of this alert is to give a broad overview of the measures, which will take effect from 1 April 2020.
30 Mar 2020	Tax Alert: Customs & Excise: Time period for internal administrative appeals	The purpose of this alert is to give a broad overview of the provisions of the Customs and Excise Act, 1964 (Act No. 91 of 1964) ('the Act') that deal with internal administrative appeals during the lockdown period declared in South Africa.
30 Mar 2020	Tax Alert: UIF – Easy-Aid Guide for Employers	This alert provides an overview of the guide and the UIF benefits declared during the lockdown period in South Africa.
30 Mar 2020	Tax Alert: UIF – Lockdown Collective Agreement for Textile industry	This alert discusses the collective agreement and its impact during the lockdown period declared in South Africa.
24 Mar 2020	Tax Alert: Economic Measures to mitigate economic impact	This alert discusses the targeted measures to mitigate the economic impact of the pandemic in South Africa.
20 Mar 2020	OECD: Tax administration responses to Covid-19: support for taxpayers	The document contains examples of measures undertaken by tax administrations globally.
20 Mar 2020	OECD: Emergency tax policy responses to the Covid-19 pandemic	Guidelines to help Tax Administrations respond to COVID-19.
2 Mar 2020	Tax Alert: National Treasury paper on reviewing the tax treatment of debt financing	This alert highlights the discussion paper dealing with an announcement made in the budget relating to interest deductibility.
28 Feb 2020	Tax alert: Doubtful Debt allowance	This year's Budget announces further changes to the doubtful debt allowance, mainly to ensure consistency.



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