

Tax Alert

SARS' withdrawal of all customs and excise concessions

3 April 2025



In brief

The South African Revenue Service (SARS) issued a Notification on 20 March 2025 of its intention to withdraw all forms of concessions currently in use by traders which are *ultra vires*.

The notice specifically includes concessions, deviations, agreements or special allowances that have been granted in the past to traders in relation to certain requirements of the Customs and Excise Act of 1964 (the Act).

Stakeholders have an opportunity to make submissions to SARS (by 23 April 2025) indicating why the concession(s) should not be withdrawn and/or suggest legislative amendments where the current concession is not provided for in the legislation.



In detail

SARS suggests that many concessions are no longer applicable due to changes in law, policy, procedure or technological advancements.

In an attempt to ensure compliance with the Act, SARS therefore intends to formally withdraw all concessions previously granted upon which traders are currently relying on.

The SARS notice requires all traders who are directly impacted by a concession that is not addressed in the legislation, policy, procedure or systems, who wish to continue to make use of same to make written submissions to SARS stating why the concession should not be withdrawn entirely.

SARS also invites traders to provide submissions for the amendment of legislation where a current concession being utilised is not provided for in the Act.

Implications:

- 1. Compliance:** Businesses must ensure they are fully compliant with the current Act, without relying on outdated concessions.
- 2. Operational changes:** Companies may need to adjust their operations and procedures to align with the updated legal requirements.
- 3. Financial impact:** The withdrawal of concessions could lead to increased costs for businesses that previously benefited from special allowances or arrangements.
- 4. Administrative burden:** Affected clients and traders will need to invest time and resources into preparing and submitting evidence or reasons to retain concessions or changes to the current laws.

Takeaway

Traders who want to continue utilising previously granted concessions by SARS or wish to make requests for legislative amendments, must make written submissions to SARS by 23 April 2025. SARS will thereafter make a determination as to whether the concession is still valid or not.

Our team is available to discuss the above in more detail and assist with the required submissions in relation to concessions or requests for legislative amendments as invited for by SARS.



Let's talk

For a deeper discussion on how this issue might affect your business, please contact:

Subject matter experts

Asif Joosub

Director: International Trade
asif.joosub@pwc.com

Herman Fourie

*Associate Director:
International Trade*
herman.fourie@pwc.com

Contributors

Urvashi Ramdutt

Manager: International Trade
urvashi.ramdutt@pwc.com

This Alert is provided by PricewaterhouseCoopers Tax Services (Pty) Ltd for information only, and does not constitute the provision of professional advice of any kind. The information provided herein should not be used as a substitute for consultation with professional advisers. Before making any decision or taking any action, you should consult a professional adviser who has been provided with all the pertinent facts relevant to your particular situation. No responsibility for loss occasioned to any person acting or refraining from acting as a result of using the information in the Alert can be accepted by PricewaterhouseCoopers Tax Services (Pty) Ltd, PricewaterhouseCoopers Inc. or any of the directors, partners, employees, sub-contractors or agents of PricewaterhouseCoopers Tax Services (Pty) Ltd, PricewaterhouseCoopers Inc. or any other PwC entity.

© 2025 PricewaterhouseCoopers ("PwC"), at PwC, our purpose is to build trust in society and solve important problems. We're a network of firms in 151 countries with over 364,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at www.pwc.com.