



Tax Alert

29 September 2026



SARS has enacted new Rules to the Customs and Excise Act, No 91 of 1964 (“the Act”), effective from 14 September 2026, to incorporate Transfer Pricing Adjustments into the Act.

Transfer Pricing Adjustments in customs now have a defined SARS process

The new Rules to Sections 40 and 41A to the Act (“the new Rules”) took effect on 14 September 2026. The new Rules relate to Transfer Pricing (“TP”) Adjustments between related companies of multinational enterprises that will have an effect on the customs value of goods imported.

The change in rules impacts importers in multinational groups raising or receiving interim or year-end TP Adjustments and will have an effect on the customs value of goods imported.

The Act now sets out the required notification, submission, payment and refund steps, while the Rules spell out precisely what must be done and which documents SARS expects, namely:

- Notify SARS by letter within one month of the TP Adjustment: by email or lodge at a customs office.
- Submit the detailed report and Customs Value Adjustment Calculation (“CVAC”) spreadsheet within 30 calendar days following the notification, showing the impact on customs value, duties, and VAT for the period.
- The documents and information to be submitted with the detailed report:
 - **Signed financials** for the adjustment period
 - **Transfer pricing policy** and compensation calculations
 - **Amended invoice**, debit or credit note
 - **Supporting agreements** and segmented financials, where applicable



SARS may also require:

- Additional information to review the TP Adjustment submission and assess its impact on the customs value;
- Payment of additional duties and VAT within 14 days of a CEB01; or
- Vouchers of Correction per bill of entry for refunds.

Two catches:

- Extensions are permitted but undefined with no stated grounds or duration, so timelines can be compressed; and
- CVAC acceptance is **not** indemnity: audit findings, fines, and penalties may still apply.

Key takeaways

The Rules were published on 11 September 2026 in Government Gazette No. 55355 and is effective from 14 September 2026.

The clock is ticking:

- Notify SARS within one month of a TP Adjustment;
- File the full document pack within 30 days;
- Proactively engage with Trade Statistics to obtain the trade data as delays squeeze the compliance timeframe further.

Transitional catch: Adjustments notified prior to 14 September 2026 need urgent review to see how they are impacted by the New Rules. Any TP Adjustment reported to SARS post 14 September 2026 will be under the new process.

The window is narrow. Contact us to assess your exposure and compliance obligations.

Contacts

Matthew Besanko

Director: Indirect Taxes

m.besanko@pwc.com

+27 (0) 78 827 6376

Bianca Romans

Associate Director: Customs & International Trade

bianca.romans@pwc.com

+27 (0) 83 382 1534

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.

© 2026 PwC. At PwC, we help clients build trust and reinvent so they can turn complexity into competitive advantage. We're a tech-forward, people-empowered network with more than 364,000 people in 136 countries and 137 territories. Across audit and assurance, tax and legal, deals and consulting, we help clients build, accelerate, and sustain momentum. Find out more at www.pwc.co.za

PwC South Africa refers to the South Africa group of member firms and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see www.pwc.com/structure for further details.