

25 November 2024

To: The South African Revenue Service

Lehae La SARS,
299 Bronkhorst Street
PRETORIA
0181

Via email:

SARS: (policycomments@sars.gov.za)

**RE: DRAFT INTERPRETATION NOTE PERTAINING TO THE DIMUNITION IN THE
VALUE OF CLOSING STOCK**

Dear Colleagues,

We have thoroughly reviewed the draft interpretation (draft IN) and our suggested revisions have been provided using track changes, in the annexed document hereto. The technical content of the draft appears to be accurate and well-founded; we therefore have no further comments pertaining thereto.

Many of the amendments pertain to citation and grammatical issues. Specifically, while SARS typically cites the SALR and SATC references when available, the "All SA LR" reference has been used in this instance.

It is also recommended that certain citations, such as the Volkswagen case, be streamlined in the footnotes by citing the case in full the first time and subsequently referring to it as "Above at 81 SATC xx" without repeating the case name.

The remaining revisions address minor grammatical adjustments.

We value the opportunity to provide commentary on this (draft IN). Furthermore, we would welcome further engagement where appropriate. Please do not hesitate to contact us should you need further information.

Yours sincerely

SAIT Tax Technical

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