

# TAXPRACTICE

## WEEKLY HIGHLIGHTS

WEEK OF 03 – 09 April 2025  
(Issue 13 -2025)

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### TOP STORIES

#### New Transfer Duty Rates effective 1 April 2025

In the recent Budget Speech, the Minister of Finance announced important changes to the Transfer Duty rates, which came into effect for property transactions occurring on or after 1 April 2025. These updated rates apply to both individuals and entities, including natural persons (individuals) and non-natural persons such as companies, close corporations and trusts.

Read [below](#) for further details regarding the revised Transfer Duty rates as announced.

#### Enhancements to Tax Directives system – A new era of simplified, secure tax compliance, effective 11 April 2025

In a move that further strengthens SARS commitment to enhancing digital services, the Tax Directives system will undergo important updates starting on 11 April 2025. These enhancements aim to improve security, streamline processes, and provide clearer guidelines for taxpayers to fulfil their tax obligations. Key improvements include tax-neutral transfer provisions, new tax directive reasons, and updates to retirement fund regulations. These enhancements align with the latest specifications and ensure that taxpayers and traders can continue to meet their obligations smoothly and securely.

For more detailed information on the scope of the updates and what to expect, please read the full story [below](#).

[#StayAbreastOfTheTaxWave](#)

# Are you a **tax practitioner** with a passion for writing?

Let's feature your article on the Tax  
Practice: Weekly Highlights.

Send your article to  
[taxassist@thesait.org.za](mailto:taxassist@thesait.org.za).

Approximately 500 – 1500 words

# PART A: COMPLIANCE & SARS OPERATIONS

## SAIT-SARS 'ON-THE-GROUND' ENGAGEMENT

### Enhancements to Tax Directives system – A new era of simplified, secure tax compliance, effective 11 April 2025

These enhancements are part of SARS's ongoing effort to optimise and streamline tax processes for the benefit of taxpayers and traders alike. The updates to the Tax Directives system are in line with [IBIR-006 Tax Directives Interface Specification Version 6.803](#) and will not only improve security but also ensure a smoother and more efficient user experience.

Below, we provide an overview of the key changes that will take effect on **Friday, 11 April 2025**, including new provisions for tax-neutral transfers, updated retirement fund regulations, and changes to the submission process.

- **Tax-neutral transfers update:** In this release, allowable transfers related to unclaimed benefit funds (48) and inactive members with insufficient information (54) are now updated. All transfers made after 1 September 2024 must include values for Vested, Retirement, and Savings components, even if some values are zero. The Recognition of Transfer (ROT) must also be submitted to include these three components.
- **New tax directive reason:** A new tax directive reason has been added to the IRP3(a) for reporting backdated (antedated) salaries and/or pensions under source code 3623.
- **Retirement Annuity Fund withdrawal:** Previously, if a retirement annuity fund member discontinued contributions and their interest was less than R15 000, they could access the full amount as a lump sum. From 1 September 2024, members can only access the Vested and Retirement components if the combined value is R15 000 or less. This limit applies at the fund level, not the policy level.
- **Cessation of South African residence:** On 1 March 2022, "Emigration Withdrawal" was replaced by "Cessation of South African Residence." From 1 September 2024, the system will no longer accept applications for "Emigration Withdrawal" as a reason for tax directives.
- **Changes to submission channels:** The RST01 and IRP3(a) forms can now be accessed and submitted via eFiling, replacing the manual submission process from 11 April 2025. The RST02 form for tax refunds related to pensions and annuities under Double Taxation Agreements will be discontinued.
- **Transfer provisions for retirement annuity funds:** The transfer provisions under paragraphs 2(1)(c) and 6A of the Second Schedule will be extended to include Retirement Annuity Funds. Starting 1 March 2025, members who have reached normal retirement age but have not retired may transfer their retirement interest to another Retirement Annuity Fund on a tax-neutral basis.

Members may access more information [here](#) and are further reminded **not to submit tax directives files on the current form after 16:00 on 11 April 2025**. SARS intends to queue and process such files after the Tax Directives system has been upgraded.

## Important update: SARS Payments Guide reflects Grindrod Bank's name change to African Business Bank

SARS has updated its Payments Guide to reflect the name change of Grindrod Bank, now renamed African Business Bank.

As a reminder, the [SARS Payments Guide](#) outlines the essential payment rules that taxpayers must follow when making payments to SARS. Adhering to these rules is crucial for ensuring that payments are processed on time and accurately allocated to the correct accounts. It is important for members to continue familiarising themselves with these guidelines to avoid complications. Failure to comply with the stipulated payment rules may result in the rejection of payments, which could cause delays in meeting tax obligations.

By following the prescribed payment protocols, taxpayers can help ensure a smooth and efficient transaction process with SARS.

## SARS releases 2025/2026 e-Logbook

Taxpayers who receive a travel allowance from an employer or principal, are entitled to claim a deduction on assessment of their annual income tax return for the use of a private motor vehicle for business purposes. To provide appropriate guidance, SARS has released the [2025/2026 SARS e-Log book](#).

For more information, members are encouraged to visit the [Travel e-log book](#) webpage for details regarding the following:

- When a taxpayer can claim for travel
- What a taxpayer is required to do to claim for travel
- What a taxpayer is required to record in their logbook
- How a taxpayer can determine the quantum to claim

Members are reminded that without a logbook, one cannot claim business travel expenses. Members should ensure that their logbook is retained for at least five years for possible verification by SARS.

## SAIT TaxHelpline – escalations

As part of our ongoing commitment to serving our members, SAIT escalates appropriate cases within the SARS structures on their behalf. For assistance with this, members can submit their queries via the [TaxHelpline](#).

The most urgent escalations this week include:

1. Delays in finalising income tax returns selected for manual intervention.
2. Delays in finalising 2024 Notice of Objections.
3. Delays in finalising and payment refunds.
4. Delays in finalising requests for remission.

## SARS regional and national operational meetings

SAIT and its Regional Representatives attend SARS/RCB regional meetings quarterly, offering opportunities for effective, systemic discussions (qualifying for CPD points)\*.

*\* For effective and meaningful engagement with SARS, Regional Representatives are encouraged to provide three specific examples of issues or challenges that arise. It is important to note that regional meetings are not intended for individual case escalations*

but serve as a platform to address systemic issues impacting the broader tax practitioner community.

#### Feedback from the RCB/SARS regional and national meetings

No regional or national meetings were scheduled for SAIT during the week of 3 - 9 April 2025.

### Upcoming RCB/SARS regional and national meetings

1. Western Cape – 4 June 2025
2. Free State and Northern Cape – 9 June 2025
3. Eastern Cape – Gqeberha and Kareiga – 25 June 2025
4. Mpumalanga – 27 June 2025
5. Eastern Cape – Gqeberha and Kareiga – 13 August 2025
6. Free State and Northern Cape – 8 September 2025
7. Free State and Northern Cape – 10 November 2025 and
8. Eastern Cape – Gqeberha and Kareiga – 12 November 2025

#### Other meetings of interest

1. SARS National Operational Forum - 15 May 2025;
2. RCB Forum meeting- 3 June 2025;
3. SARS National Operational Forum – 14 August 2025;
4. RCB Forum meeting tentatively scheduled for 16 September 2025;
5. RCB Forum meeting- 11 November 2025; and
6. SARS National Operational Forum – 20 November 2025.

### DAILY COMPLIANCE AND ADMINISTRATION

#### Due dates for reporting and payments: March 2025

Month	Date	Tax Type	Notification
April 2025	01/04/2025	Employment Taxes	<b>EMP501</b> - Start of the annual employer reconciliation submissions
	01/04/2025	Other	<b>Third-party data (IT3)</b> - Start of the annual third-party submissions period
	07/04/2025	Employment Taxes	<b>EMP201</b> - Submissions and payments
	25/04/2025	Value-Added Tax	<b>VAT201</b> - Manual submissions and payments
	30/04/2025	Value-Added Tax	<b>VAT201</b> - Electronic submissions and payments

### SAIT member resources

- [SAIT important tax dates calendar](#) – contains important dates from January 2025 to January 2026 (unchanged).
- [SAIT SARS contact map](#) – links service requirements to SARS channels (unchanged).

### Key operational news

#### Reminder regarding the beginning of the Employer Annual Declarations (EMP501) period: 1 April to 31 May 2025

Employers are reminded that the submission period for EMP501 began on 1 April 2025 and



will run until 31 May 2025. This critical compliance requirement must be completed to ensure accurate reporting of employee earnings and deductions for the tax year.

SARS strongly encourages employers to gather all required information in advance and ensure it is processed correctly to meet the deadline and avoid any penalties. To support employers in meeting their obligations- and to help SARS to achieve its “Higher Purpose” of enabling the state to provide for the well-being of all South Africans- SARS has prepared a detailed letter. This letter outlines what is new in this period, outlines the submission process, and includes further information about applicable penalties.

Read [here](#) for more details.

## **Reminder regarding SARS’ announcement of positive preliminary results**

As the fiscal year came to a close, SARS announced its preliminary revenue collection results for the 2024/25 fiscal year. Despite a challenging economic environment, SARS reported a positive preliminary outcome, collecting a record R2.303 trillion by March 2025, marking a 6.9% year-on-year growth, outperforming the revised nominal GDP growth estimate of 5.4%. Notwithstanding the disbursement of R447.7 billion in refunds, the highest-ever in SARS’ history, SARS managed to net total revenue of R1.855 trillion, exceeding the target of R1.846 trillion set by the Minister of Finance

### **Key highlights from the announcement include the following:**

#### **1. Record revenue collection**

SARS has collected a record R2.303 trillion by the end of March 2025, marking a 6.9% year-on-year growth. This achievement surpasses the estimated nominal GDP growth of 5.4% for the year and reflects SARS’ resilience in a challenging economic environment.

#### **2. Refunds and Compliance**

SARS paid out R447.7 billion in refunds, the highest-ever amount, representing an 8.2% increase from the previous year. This is part of SARS’s commitment to supporting taxpayers, but it also remains vigilant against refund fraud. In this fiscal period, SARS prevented R146.7 billion in impermissible refunds, showing its dedication to protecting the system from fraudulent claims. The revenue collected net of refunds amounted to R1.855 trillion, exceeding the revised estimate by nearly R8.8 billion.

#### **3. Strong Tax-to-GDP ratio**

SARS achieved a tax-to-GDP ratio of 24.8%, demonstrating the country’s fiscal health and efficient revenue generation. The tax buoyancy ratio stood at 1.20, reflecting the government’s adaptability in its tax revenue strategies, contributing to sustained fiscal stability.

#### **4. Sectoral growth contributions**

The Finance, Community, Wholesale, and Construction sectors were significant contributors to the 6.1% year-on-year growth in revenue collections. Notably, Personal Income Tax (PIT) saw strong growth, driven by above-inflation increases in pay-as-you-earn (PAYE) collections in the Finance and Community sectors, with PIT increasing by R81.8 billion (12.6%). Additionally, improvements in tax compliance are evident, with the Voluntary Compliance Index for PIT increasing by 0.38 percentage points.

#### **5. Corporate Income Tax (CIT) performance**

CIT grew by R6.5 billion (2.1% increase), led by higher CIT provisional tax collections, especially from the Finance sector. Despite a contraction in the Mining sector, the overall performance was positive. The CIT Voluntary Compliance Index improved by 3.2 percentage points, signaling better filing compliance.

## **6. Value-Added Tax (VAT) growth**

Net VAT collections increased by R10.5 billion (2.3% increase), contributing 24.7% to total collections. A significant portion of VAT refunds (R365.5 billion) were directed to key sectors such as Mining, Finance, and Manufacturing. VAT refunds grew by R22.5 billion (6.6%), and SARS successfully avoided R74 billion in VAT leakage, with enhanced measures to tackle fraud and improve refund verification processes.

## **7. Focus on SMMEs and Domestic VAT**

Domestic VAT collections amounted to R562.1 billion, growing by 7.0%. Notably, SMMEs received R127.4 billion in VAT refunds, underlining SARS's role in supporting small businesses, which are crucial for job creation. The VAT Voluntary Compliance Index also rose by 1.8 percentage points, reflecting an overall improvement in compliance.

## **8. Technology and Data-Driven Compliance**

SARS has embraced advanced technologies like AI and machine learning to enhance compliance. These innovations helped recover R301.5 billion through compliance revenue interventions, including R154.8 billion from cash collections and R146.7 billion from preventing fraud and impermissible refunds.

## **9. Addressing Illicit Economy and Trade-Based crimes**

SARS continues to tackle illicit financial flows, including trade mispricing and illicit cigarette trade. Significant efforts were made in dealing with syndicated crime, which resulted in the seizure of R30 billion through complex investigations. These efforts highlight SARS's commitment to maintaining a fair and transparent tax system. SARS also continues to have a keen focus on BEPS activities which erode the tax base. To this end, SARS has identified 19 cases of BEPS within the LBI segment, involving 8 cases of Transfer Pricing, 5 cases in International Tax, 5 cases in Corporate Income Tax, and 1 case related to dividend restructuring. SARS has estimated that these cases have resulted in a permanent loss of R2.2 billion and a cash recovery of R2.8 billion. Additionally, 40 cases are currently under investigation.

## **10. Tax Revenue breakdown and contribution by region and sector**

The largest portion of South Africa's tax revenue was collected from Gauteng, signalling where most of the economic activity lies. This was followed by KwaZulu-Natal and the Western Cape. Large businesses continue to be the primary contributors, offering the best return on investment for SARS. However, circa, 29.3 million registered individuals and trusts and 6.4 million companies are among the dominant group in the tax base. This is a notable increase from just 3 million active taxpayers in the 1993/1994 financial year – which highlights the expansion of South Africa's tax base over the years.

## **Key takeaways**

- Taxpayers are urged to ensure that all their tax affairs remain in order.
- The Minister of Finance has set a revenue estimate of R2.006 trillion for the 2025/26 fiscal year, reflecting confidence in SARS' ability to meet this target.
- SARS remains committed to expanding its tax base, strengthening compliance measures, and driving growth through innovation and collaboration to meet this revenue target.
- SARS is advancing towards a tax and customs system focused on voluntary compliance while strengthening its ability to detect and deter non-compliance. The goal is to expand the tax base, promote fiscal citizenship, and leverage data and technology to fulfil its mandate. Looking ahead to the 2025/26 fiscal year, SARS will focus on optimising its resources and deepening collaboration with stakeholders to build trust in the organisation.
- The Commissioner thanked all South Africans, particularly compliant taxpayers and traders, for consistently fulfilling their legal obligations. He emphasized that SARS is committed to making the taxpayer experience as easy and seamless as possible, with the goal of providing the best service through minimal intervention.

The full media release may be accessed [here](#). Members with any additional queries are welcome to contact [SARSMedia@sars.gov.za](mailto:SARSMedia@sars.gov.za).

## Other SARS and related operational publications and announcements

No other SARS and related operational publications and announcements were made in the week of 3 - 9 April 2025.

## TAX PRACTITIONER MANAGEMENT

### SAIT TaxHelpline – Tax practitioner access and functionality (eFiling)

No recurring tax practitioner access and functionality issues were identified via the SAIT TaxHelpline during the week of 3 - 9 April 2025.

## Key tax practitioner news

### Reminder that the 2025 SARS tax practitioner registration and compliance audit is underway

It is that time of the year when membership compliance is under review, and SAIT is conducting the annual SARS compliance Audit. The 2025 Compliance Audit commences in **April 2025**.

Under the Tax Administration Act, individuals providing tax-related services must register with both a Recognised Controlling Body (RCB) and SARS as a Tax Practitioner. RCBs are also required to manage their tax practitioner members' compliance with registration requirements.

### Mandatory SARS and practitioner compliance requirements

- Valid Tax compliance PIN (in your personal name) and good standing;
- Criminal-free status
- Completion of 2024 CPD hours
- Submission of annual declaration forms

As part of this process, various categories of membership compliance and registration information will be updated. PR numbers will also be updated, as some members are still using outdated alpha-numeric PR numbers. Members who are still using alpha-numeric PR numbers and those who do not have their PR numbers are classified by SARS as "ghost practitioners" and risk deregistration. SARS requires all tax practitioners to activate and use their unique PR number.

As an RCB, SAIT is legally required to audit 20% of its entire membership and report compliance status to SARS annually. SARS and SAIT will randomly select a pool of tax practitioners to partake in this mandatory compliance audit. All selected candidates will be notified via email, telephone and SMS. Prompt response is highly encouraged.

### Consequences of non-compliance

SAIT aims to help members become compliant, stay empowered, and avoid deregistration or membership downgrade to the unregulated Affiliate category. Although we achieved 94% compliance conversion strike rates in the previous audit, 134 members remained non-compliant and were subsequently downgraded, thus losing their practitioner status.



## SARS deregistrations:

With over 30 tax practitioner deregistrations due to non-compliance with section 240(3)(d) of the Tax Administration Act (TAA) in 2005 already, the rising numbers are alarming.

Compliance issues typically stem from lapses in tax obligations, failure to meet Continuing Professional Development (CPD) requirements or criminal activity. Practitioners must remain informed and compliant with SARS regulations to avoid deregistration as this can severely impact their professional standing and operational capabilities.

Kindly note that members who default on the above requirements will be suspended and reported to SARS for deregistration.

Given that tax practitioner compliance is a statutory requirement, **our consultants are here to assist**. However, failure to respond to and comply with the audit may result in revocation of registration.

For any inquiries on the annual Tax Practitioner Audit, please contact the SAIT Legal and Compliance Department via the following email: [info@thesait.org.za](mailto:info@thesait.org.za).

## Government & stakeholder newsletters

### SARS publishes April 2025 Monthly Tax Digest

SARS has released the April edition of its **Monthly Tax Digest**. This month's issue focuses on the **Annual Employer Declarations (EMP501) period**, which opened on 1 April and will run until 31 May 2025.

Tax compliance remains essential for SARS's ability to carry out its revenue collection mandate. During the Annual Employer Declaration period, **employers are required to fulfil their obligations** by ensuring the accurate and timely submission of all relevant tax returns.

It is critical to ensure that all outstanding monthly returns (EMP201) and annual reconciliations (EMP501) are submitted by the deadline of **31 May 2025**. Failure to submit on time, not filing, or submitting incorrect EMP501 information may result in administrative penalties.

The **April edition** of the Monthly Tax Digest covers the following key topics:

- Submission channels and methods
- Insights into the new e@syFile™ Employer Version 8.0
- Why accurate and timely filing matters
- Criminal offences to prevent fines or imprisonment.

For detailed guidance, employers can refer to the [e@syFile™ Employer User Guide](#) or the [Step-by-Step Guide to the Employer Reconciliation Process](#), both available on the SARS website. Additionally, employers can watch the tutorial: "[How to submit an Employer Annual PAYE Reconciliation EMP501](#)" for more insights.

## Reminder regarding the publication of the recent Tax Practitioner Connect newsletter

On 31 March 2025, SARS published issue 61 of the [Tax Practitioner Connect](#) newsletter. The newsletter covers the following topics:

- Donations Tax Declaration Form (IT144)

Previous editions of this publication have shed light on the above. As a reminder, **a donation is any complimentary disposal of property**, including any free waiver or giving up of a right. The current rate of donations tax is 20% if a donation is less than R30 million, and 25% for donations worth more than R30 million. After donating, the donor must complete and submit a Donations Tax declaration form (IT144) to SARS. For conditions, exemptions, guides, and more, see the [Donations Tax webpage](#).

After donating, taxpayers are required to complete the Donations Tax Return (IT144) and ensure that the appropriate tax is paid. The IT144 form can be downloaded from the [Donations Tax webpage](#). Members are strongly encouraged to peruse previous versions of this publication that outline the steps and process for submitting the IT144 donation tax return.

- *Owing Money to SARS*

As part of its ongoing Compliance Programme, SARS continues to drive general compliance work, which includes undertaking compliance follow-ups – including following up or contacting taxpayers regarding their outstanding debt.

### **How to obtain information regarding your outstanding debt**

- o Log on to **eFiling** and request a statement of account.
- o Alternatively, you can Log on to the **SARS MobiApp** and request a statement of account for Personal Income Tax.
- o Request a balance statement and/or statement of account for Personal Income Tax by sending an **SMS** to SARS on 47277. (This service can be accessed with or without data/airtime.)
- o **SARS USSD Channel** by typing, on your mobile device, a string of characters which comprises of an asterisk (\*), followed by a few digits and ending with a hashtag (#) and dialling. *Balance (Space) ID number/Passport number/Asylum Seeker number*

### **How to request tax services via the SARS USSD Channel**

- Step 1:** Initiate USSD by dialling \*134\*72773
- Step 2:** Select the service you require
- Step 3:** Taxpayer verification – SARS will request you to complete either your ID/Passport/Asylum Number
- Step 4:** Tax Resolution- Upon successful verification by SARS, a response will be displayed

To request a Statement of Account on eFiling

- o **Login to eFiling:** Access the SARS eFiling platform by logging in with your credentials.
- o **Navigate to the Income Tax Work Page:** Once logged in, go to the “Income Tax Work Page.”
- o **Request Historic Documents:** Click on the “Request Historic Documents” button available on the Income Tax Work Page.
- o **Select Statement of Account:** Select “I want to request a Statement of Account” and click “Next” to proceed.
- o **Choose the Period**
- o **Generate Statement:** Click on “Request” to generate the statement and if the statement is successfully generated, a hyperlink will be displayed.
- o **View the Statement:** Click on the hyperlink to view your Statement of Account.

Should additional assistance be required, members are reminded that the SARS Online Query System (SOQS) is also a channel to log an account query.

The following page tells you how to make a payment: [Make a Payment |South African Revenue Service](#).

- *Reportable Arrangement Submissions now available on eFiling*

In February 2025, SARS announced that it is introducing the option to submit Reportable Arrangements on eFiling. Previously, these submissions were submitted manually via email, however, they can now be made under Additional Services on eFiling.

The submission process remains unchanged, with the RA01 form and supporting documentation still required. Both eFiling and email submissions will run parallel until 31 May 2025, after which email submissions will no longer be accepted.

This move is part of SARS's effort to streamline its systems and enhance security.

For more information, see the updated guide [Guide to Complete the Company Income Tax Return \(ITR14\) on eFiling](#).

## Reminder regarding the publication of the OTO's March edition of the FairPlay newsletter

On 31 March 2025, the OTO published the latest edition of the [Fair Play](#) newsletter, which explores the topic of *Balancing Fairness and Compliance*.

The newsletter covers the following topics:

- *Progress Report on eFiling Profile Hijacking Taxpayer Experience Survey*

The OTO has conducted a critical review of systemic issues related to eFiling profile hijacking and the challenges taxpayers face in resolving them. This survey ran from 3 February 2025 and closed on 5 March 2025. It provided practitioners and their clients the opportunity to share common issues related to recovering hijacked eFiling profiles and help improve service delivery.

The OTO has announced that the survey was successful and that responses received amounted to approximately 393 taxpayers and tax practitioners. The data collected from the survey played a significant role in the OTO's investigation of this issue. The investigation aims to identify the root causes of the issue, and to develop strategies to prevent such occurrences in the future. The OTO is working closely with SARS to ensure that the eFiling system remains secure and that taxpayers can confidently manage their tax affairs without fear of unauthorised access.

The Tax Ombud will in due course inform the public of the outcome of the investigation and when the report can be expected.

- *Common Issues Regarding Tax Fairness and Compliance*

The OTO delivers services nationwide through various platforms, uncovering key tax concerns among stakeholders, which include some of the following concerns:

- **Lack of timely feedback from SARS:** Taxpayers frequently complain about not receiving timely feedback from SARS. When feedback is provided, it is either a request for the same information or it fails to meet taxpayers' expectations, prompting them to seek assistance from the OTO.
- **eFiling profile hijacking:** There has been a surge in complaints about eFiling profile hijacking and manipulation of taxpayer information. This has resulted in taxpayers

finding themselves in debt to SARS or having their refunds paid into fraudulently held bank accounts.

- **Delays in VAT and income tax refunds:** Taxpayers have lodged complaints stating that, amongst other things, once an assessment has been selected for audit or verification, the process takes over 21 working days. In some instances, bank detail verification needs to be done after the verification or audit of the assessment, following which the refund will be paid out.
  - **Non-compliance with payment arrangements:** Taxpayers complain that SARS does not honour the request for payment arrangements arranged with them, resulting in SARS issuing garnishee orders (ITA88) to employers to deduct outstanding tax from employees' salaries. In some instances, SARS withdraws funds from taxpayers' bank accounts, disregarding the existence of payment arrangements.
  - **Delays in issuing tax residency certificates:** Taxpayers have raised concerns about the time it takes to finalise these certificates, adversely impacting the tax position of people in South Africa who are residents in another country where South Africa has a double tax agreement.
  - **SARS Contact Centre inefficiencies:** Many taxpayers express frustrations they experience in securing appointments or receiving assistance through the SARS Contact Centre. Taxpayers have resorted to calling the OTO Customer Service line for assistance that should be provided by SARS.
- Additional features from the publication include:
    - OTO Media and Stakeholder Engagements
    - The Tax Ombud's insights on the need for taxpayers to strive for Tax Literacy
    - Reflections on the OTO's 2024/2025 Financial Year
    - Various articles unpacking the core topic as penned by various industry experts.

### Other tax practitioner access and functionality publications and announcements

No other tax practitioner access or functionality publications or announcements were released by SARS.

## PART B – LEGISLATION & POLICY

### LEGISLATION, INTERNATIONAL AGREEMENTS & POLICY

#### Tax policy & international agreements

#### New Transfer Duty Rates set to take effect in April 2025

In an important announcement made during the recent Budget Speech, the Minister of Finance revealed new Transfer Duty rates that will come into effect for property transactions from 1 April 2025. These revised rates will apply to all property buyers, whether they are natural persons (individuals) or non-natural persons such as companies, close corporations, and trusts.

Taxpayers who are looking to acquire property in the near future must understand these new rates to optimise their planning and budgeting. The rates are structured in a way that progressively increases based on the property's value, ensuring that higher-value properties incur a higher duty.

The new rates are as follows:

Value of Property (Rand)	Rate
<b>0 – 1 210 000:</b>	0%
<b>1 210 001 – 1 663 800:</b>	3% of the value exceeding R1 210 000, but not exceeding R1 663 800
<b>1 663 801 – 2 329 300</b>	R13 614, plus 6% of the value exceeding R1 663 800, but not exceeding R2 329 300
<b>2 329 301 – 2 994 800:</b>	R53 544, plus 8% of the value exceeding R2 329 300, but not exceeding R2 994 800
<b>2 994 801 – 13 310 000</b>	R106 784, plus 11% of the value exceeding R2 994 800, but not exceeding R13 310 000
<b>13 310 001 and above</b>	R1 241 456, plus 13% of the value exceeding R13 310 000

These changes reflect a shift towards a more progressive tax system, with higher rates for higher-value properties. Buyers should take note of the new rates when planning property purchases after 1 April 2025 onwards, as these revised rates may significantly impact the cost of acquisition.

To help ensure smooth property transactions under the updated structure, members are advised that further information is available on the [Transfer Duty](#) webpage, as well as the updated guide ([TD-AE-02-G02 – Guide for Transfer Duty via eFiling – External Guide](#)).

#### National legislation

#### Reminder regarding amendments to the Employment Tax Incentive that came into effect on 1 April 2025

On 28 March 2025, the National Treasury and SARS published the [2025 Draft Rates and Monetary Amounts and Amendment of Revenue Laws Bill](#), which took effect on 1 April 2025. The proposed amendments to the ETI Act are as follows:

- Increase the remuneration threshold and enforce compliance with wage regulating measures as outlined in Section 4(1)(b)(i) and (ii). The changes are as follows:  
“(i) where the employee is employed and paid remuneration for at least 160 hours in a



month, the amount of **R2 500** (previously R2 000) in respect of a month; or  
(ii) where the employee is employed and paid remuneration for less than 160 hours in a month, an amount that bears to the amount of **R2 500** (previously R2 000) the same ratio as 160 hours bears to the number of hours that the employee was employed for and paid remuneration by that employer in that month.”

- Clarifying the remuneration threshold as this relates to who is a qualifying employee as outlined in **Section 6(g)**. The revised amendment is as follows:

“(g) receives remuneration in an amount less than **R7 500** (previously R6 500) in respect of a month”

- Method in how to determine the amount of employment tax incentive as outlined in section 7:

Section 7:

The determination of ETI as per section 7, will be developed as follows:

Monthly remuneration	Formula First 12 months	Formula Second 12 months
R0 — R2 499.99	60% of monthly remuneration	30% of monthly remuneration
R2 500 — R5 499.99	R1 500	R750
R5 500 — R7 499.99	R1 500 — (75% x (monthly remuneration — R5 500))	R750 — (37,5% x (monthly remuneration — R5 500))

Members are urged to take note that these amendments will remain in effect for 12 months, subject to Parliament passing the necessary legislation to implement the announcement in the national annual budget within that period.

Please visit the [Employment Tax Incentive \(ETI\) webpage](#) for more information.

## LEGISLATIVE INTERPRETATION

### Legislative Calls for Comment

SARS has published the following draft interpretation note for comment:

- [Draft Interpretation](#) Note that provides clarity on the tax treatment of amounts received by or accrued to missionaries that perform religious or related activities.

The SAIT Tax Technical team is reviewing this draft interpretation note to provide feedback to SARS. Members who wish to transmit their commentary may email [ksesana@thesait.org.za](mailto:ksesana@thesait.org.za) by no later than 23 April 2025.

### Submissions made to SARS and current calls for comment

No submissions in response to legislative calls for comment were made in the week of 3 - 9 April 2025.

### Legislative counsel publications

SARS has published the following legal counsel publications:

In previous editions of this publication, we have written to inform the membership about a plethora of the recent [regulations](#) that were promulgated on 14 March 2025. As a result of the publication of these regulations, SARS has published two VAT-specific publications relating to Frequently Asked Questions that have been drafted to assist vendors who may have any questions on the following:

- Frequently Asked Questions – [Domestic Reverse Charge Regulations](#)
- Frequently Asked Questions – [Supplies of Electronic Services](#)

Members are reminded that the frequently asked questions (FAQs) above have been compiled to address common queries from vendors and the public regarding the implications of recent regulations and amendments.

These FAQs are designed to provide clarity and ensure consistency on practical and technical aspects. It is imperative to note that these FAQs are not intended to serve as legal references.

## Published court cases

No new court cases were published in the week of 3 – 9 April 2025.

## Other SARS publications and announcements

No other legislative publications or announcements were made by SARS during the week of 3 - 9 April 2025.

## OTHER MATTERS OF INTEREST FOR A TAX PRACTICE

### Reminder regarding the call for participation in Tax Board Panel of Chairpersons 2024 – 2029: Application invitation letter to tax practitioners

SARS is inviting applications from tax practitioners to join the Panel of Tax Board Chairpersons for the period 2024-2029. The Tax Board, established under section 108 of the Tax Administration Act (TAA), adjudicates tax disputes involving amounts less than R1 million.

Members should take note of the following:

- **Eligibility:** Applicants must be practising tax practitioners, registered with a Recognised Controlling Body (RCB), in good standing, and tax compliant.
- **New amendment:** The Tax Laws Amendment Act 43 of 2024 now allows registered tax practitioners, in addition to legal practitioners, to be appointed as Chairpersons.
- **Application requirements:** A brief CV (max two pages), confirmation of good standing from your RCB, and a tax compliance certificate from SARS.

Interested applicants may make submissions by 18 April 2025.

Please be reminded to submit your application together with all the required supporting documents, including your CV. SARS has noted that several applications have been received without the necessary documentation, as requested above. If you intend to express interest in the above opportunity, kindly ensure that your application is complete to avoid any issues.

For more details, interested practitioners should contact Nene Mateane ([nmateane@sars.gov.za](mailto:nmateane@sars.gov.za)) or Kelebogile Sekoto ([ksekoto@sars.gov.za](mailto:ksekoto@sars.gov.za)) by close of business on 18 April 2025.