

# TAXPRACTICE

## WEEKLY HIGHLIGHTS

WEEK OF 10 – 16 April 2025  
(Issue 14 -2025)

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### TOP STORIES

#### Statement of agreed outcomes from the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS)

In a major show of international cooperation, nearly 450 delegates from 135 countries converged for the 17th Plenary meeting of the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting. The summit marks a pivotal step forward in the global effort to reshape international tax rules for the digital age. The discussions centered around the implementation of the Global Minimum Tax and efforts to curb tax avoidance by multinational corporations. The meeting also broadened its scope to tackle emerging challenges- from global mobility to the nexus of tax policy, inequality, and growth.

This summit enabled developing countries to have a stronger voice in conversations around domestic resource mobilisation and capacity building, signalling a shift toward a more inclusive and equitable global tax landscape.

Read more information [here](#).

#### Relief from South African Tax for Pension and Annuity Income

A key update has come into effect in the administration of retirement fund benefits in South Africa. From 11 April 2025, all funds processing a *Savings Withdrawal Benefit* must use the IRP3(a) – Application for a Tax Directive: Gratuities and Two-Pot Savings Withdrawals Benefit when applying for a tax directive.

This requirement forms part of the ongoing implementation of the Two-Pot Retirement System, which aims to allow members early access to a portion of their retirement savings. Importantly, upon submission of the IRP3(a), SARS will consider whether any relief from tax on the Savings Withdrawal Benefit applies. Funds are reminded that compliance with this directive process is essential to ensure correct tax treatment and to avoid delays in benefit payments to members.

More information can be accessed [below](#).

#### Tax Directives 2025: What's changing and why it matters

SARS has modernised its tax directive application system to reflect changes in retirement fund rules and international tax agreements. Aimed at simplifying compliance, increasing automation, and aligning with recent tax law amendments, SARS has implemented significant legislative and system updates to the Tax Directives platform. These include enhancements to various forms, guides, and processes, such as those that include the digital rollout of RST01 applications via eFiling for taxpayers seeking DTA relief on pensions and annuities, and the addition of a new reason to the IRP3(a) form to cater for backdated salaries and pensions under section 7A.

More information is available [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

### Relief from South African Tax for Pension and Annuity Income

From 11 April 2025, a significant change in the South African tax landscape took effect. SARS has introduced a new requirement for the use of the IRP3(a) form – *Application for a Tax Directive: Gratuities and Two-Pot Savings Withdrawals Benefit*. This form must now be used by retirement funds when paying out a Savings Withdrawal Benefit. Upon application, SARS will consider relief from South African tax on the Savings Withdrawal Benefit income.

#### Background

Many countries tax both residents on their worldwide income and non-residents on income earned locally. This can lead to double taxation- once in the country of residence and again in the source country. To prevent this, South Africa has signed Double Taxation Agreements (DTAs) with several countries. These treaties either assign taxing rights to one country or allow a tax credit or exemption to avoid being taxed twice.

#### What is the IRP3(a) Form?

The IRP3(a) form is an application for a tax directive that specifically addresses gratuities and the newly introduced Two-Pot Savings Withdrawals Benefit. This directive is crucial for ensuring that the correct amount of tax is withheld from these payments, aligning with the latest tax regulations.

#### Key Changes and Benefits

1. **Application for tax relief:** When applying using the IRP3(a) form, relief from South African tax on the Savings Withdrawal Benefit income will be considered. This means that individuals receiving such benefits may be eligible for tax relief, reducing their overall tax liability.
2. **Streamlined process:** The introduction of this form aims to streamline the process for both taxpayers and the funds managing these benefits. By standardising the application process, SARS ensures that all necessary information is captured accurately, facilitating quicker and more efficient tax directive issuance.

#### How to Apply for the Tax Directive

Individuals or their representatives seeking relief from Employees' Tax on pensions and annuities (as non-residents) should follow these steps:

1. Log onto eFiling services and access the '*RST01 – Application by Non-Resident for a Directive for Relief from South African Tax for Pension and Annuities in terms of a DTA*' application form.  
*Note: You will not be able to submit the RST01 application without a tax number.*
2. Indicate the country of residence to ensure the correct DTA is considered.  
*Note: A tax office stamp is no longer required when submitting the RSR01 electronically.*
3. Complete all the required fields and schedules on the RST01 application form in full.
4. Attach a certificate of residency.

5. Attach a history of employment on the employer's letterhead.
6. Where a DTA allows the source country (in this case, South Africa) to exempt the income, proof that the income is or was included as income in the country of residence must be attached (e.g., a recent tax assessment highlighting the income, no older than one year).
7. SARS will evaluate the tax directive application within 21 working day.

With effect from the 2024 year of assessment, the period of validity for the tax relief directive is three years for pension and/or annuity income.

Taxpayers are reminded that if a taxpayer changes residence to a different jurisdiction from the one in respect of which the directive was issued, the directive **automatically becomes invalid** from the date of the change.

### **Additional Resources**

- Relief from South African Tax for Pension and Annuity Income: This webpage provides comprehensive details on how non-residents can apply for tax relief on pension and annuity income, including the necessary steps and documentation required
- When a tax directive application will be rejected
- The process to request a refund, and
- Reasons for the rejection of a refund.

To access further reading material, members can refer [here](#).

SARS aims to ensure that taxpayers receive the appropriate tax relief, thereby reducing their tax burden and promoting compliance with South African tax laws.

### **SAIT and SARS collaborate to present a practical e@syFile webinar**

On 10 April 2025, SAIT, in collaboration with SARS, hosted a webinar to discuss the latest e@syFile Employer Version 8.0. The session highlighted the critical importance of installing the updated version, addressed common issues users have experienced, and covered other key updates and relevant information about the new release.

We encourage members to submit any queries timeously and as soon as they arise. While SARS has limited capacity, they have expressed their willingness to aid our members wherever possible.

Members who were unable to watch the live webinar may access the recorded version [here](#).

### **Some key reminders regarding e@syFile Version 8.0**

- [e@syFile™](#) version 8.0 was designed to help taxpayers (who are employers or payroll administrators) working with SARS to quickly, easily and conveniently manage their tax affairs.
- Always back up current data before installing the latest version, as installation may delete existing information. Any beta version must be uninstalled first.
- Ensure that the import file meets the latest BRS requirements prior to importing to avoid rework.
- The latest version must always be used- SARS will not accept submissions made using outdated software. Users will be prompted to update automatically or can download the latest version directly from eFiling.

### **Frequently Asked Questions:**

Below are some of the FAQs the Tax Helpline has identified from members regarding the new e@syfile platform. The respective responses, as indicated below, were provided by the

SARS eFiling team, who also encourage users of the new e@syfile to contact them directly at [support@sarsefiling.co.za](mailto:support@sarsefiling.co.za) should they be experiencing any issues with the new version.

It is important to note that from **1 March 2025**, older versions of e@syFile™ Employer will no longer be supported. **Employers who fail to upgrade will be unable to submit reconciliations and tax certificates using the old software and may face non-compliance penalties.**

**Q1:** *I cannot download the latest version of the E@syFile.*

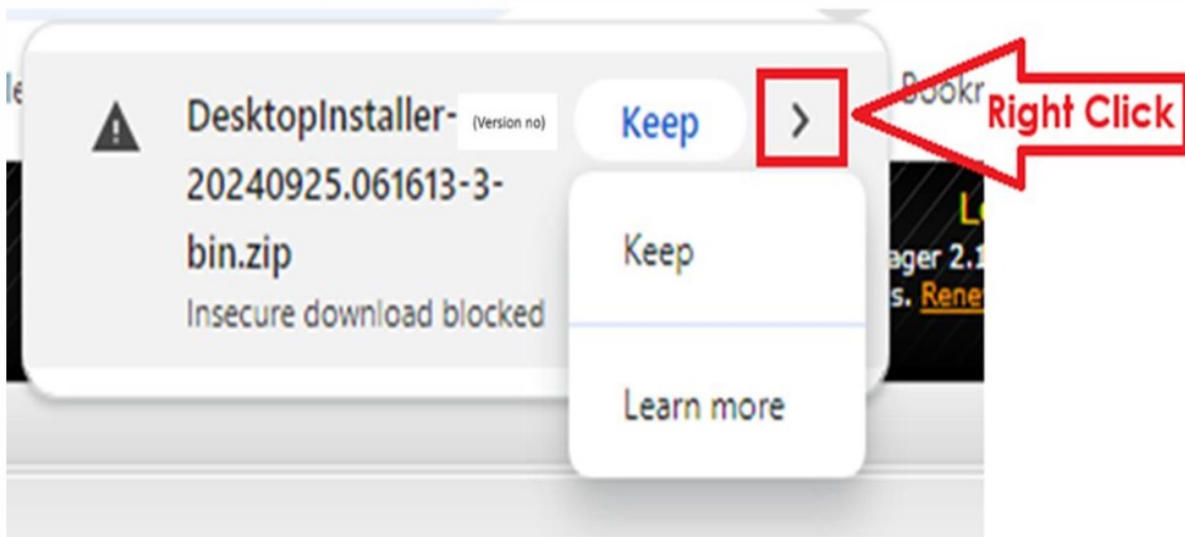
**Response:** To ensure smooth operation, employers must meet the following minimum system requirements:

- Operating System: Windows 10 or higher (64-bit recommended).
- RAM: Minimum 8GB (16GB recommended for large employers handling bulk submissions).
- Storage: At least 2GB of free disk space.
- Internet Connection: Required for software updates and online submissions.

**Top Tip:** The minimum system requirements for e@syFile Employer Version 8.0 must be met to successfully download and operate the application. Additionally, the new application operates like a browser, making memory very important. Users are encouraged to upgrade their system memory to ensure optimal performance of the platform.

**Q2:** *I keep encountering an “insecure file” message when trying to download the latest version.*

**Response:** If you receive an “insecure file” warning when attempting to download the new version, please right-click on the arrow next to the warning message and select ‘**Keep**’ to continue the download (see image below)



**Top Tip:** Ensure all necessary applications required to download and operate the latest version of e@syFile are accepted. Review and update your IT policies to allow the installation of essential applications or components, including JavaScript, to ensure the application functions correctly.

**Q3:** *After installing the latest version, I encountered the following error message.*



## e@syFile Thin Client - System Unavailable

e@syFile Employer server cannot be reached. It is either still starting up or not available

Please try again later. If the problem persist, please contact your administrator.

### Response:

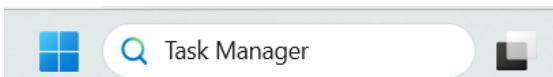
Following the installation of the e@syFile™ TC application, the error message shown above may appear. This is typically due to the application finalising the creation of its database and establishing a connection to the e@syFile™ server. Please allow approximately 5- 10 minutes before attempting to launch the application again.

If the issue persists for longer than 15 minutes:

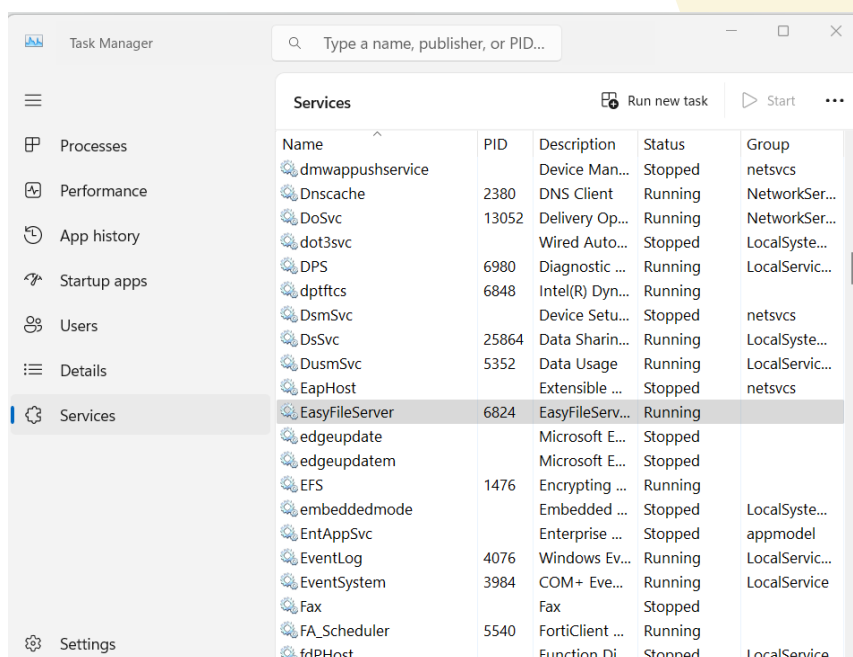
- Confirm that your computer meets the minimum RAM requirement of 8GB.
- If your system has more than 8GB of RAM and the error continues, try restarting the e@syFile™ server manually.

### How to restart the e@syFile™ server:

1. Open **Task Manager** (press Ctrl + Alt + Del and select Task Manager or search for it in your Start menu) (see image below)



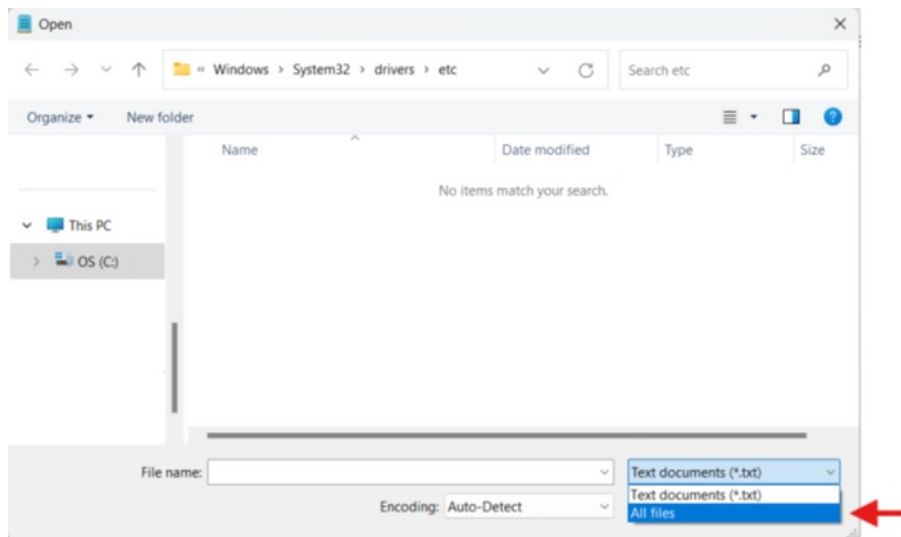
2. Click on the Services tab.
3. Scroll down to find EasyFileServer, right-click on it and select Restart.
4. Wait approximately 5 minutes, then reopen e@syFile™ TC.



If the error persists, verify that the e@syFile TC IP address has been added to the host file.

Open the Notepad application and follow the steps below:

1. Click on File > Open.
2. Click on Windows.
3. Click on System32.
4. Click on Drivers.
5. Click on etc.
6. Click on the “Text document” drop-down menu and select “All Files”.



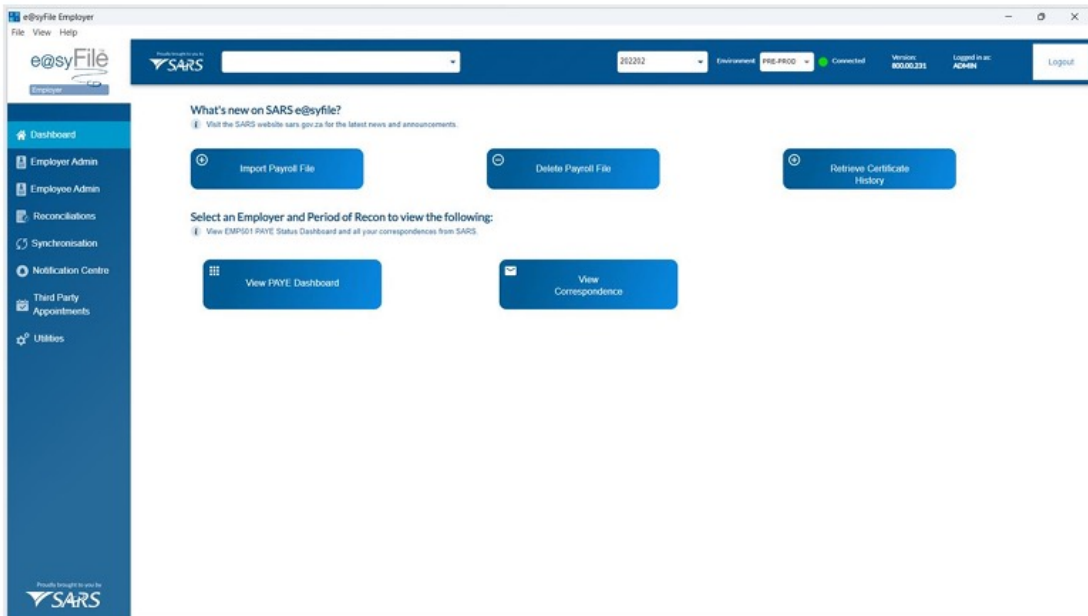
7. Click on “Hosts” and check that the IP address, 127.0.0.1, easyfile.sars.gov.za, appears.
8. The IP address needs to appear on its own line.
9. Save any changes that need to be done, then save the host file, and then try to log into e@syFile.

#### **Q4:** How do I retrieve Certificate History?

**Response:** Follow the steps below to retrieve certificate history:

1. From the Dashboard, select **Retrieve Certificate History**.
2. You may select an **Employer** and **Period of Reconciliation**, although this is not required to access the function.

**Please note:** Employee records will only be retrieved for a reconciliation period if a certificate was created. As a result, an employee may appear in one reconciliation period but not in another.



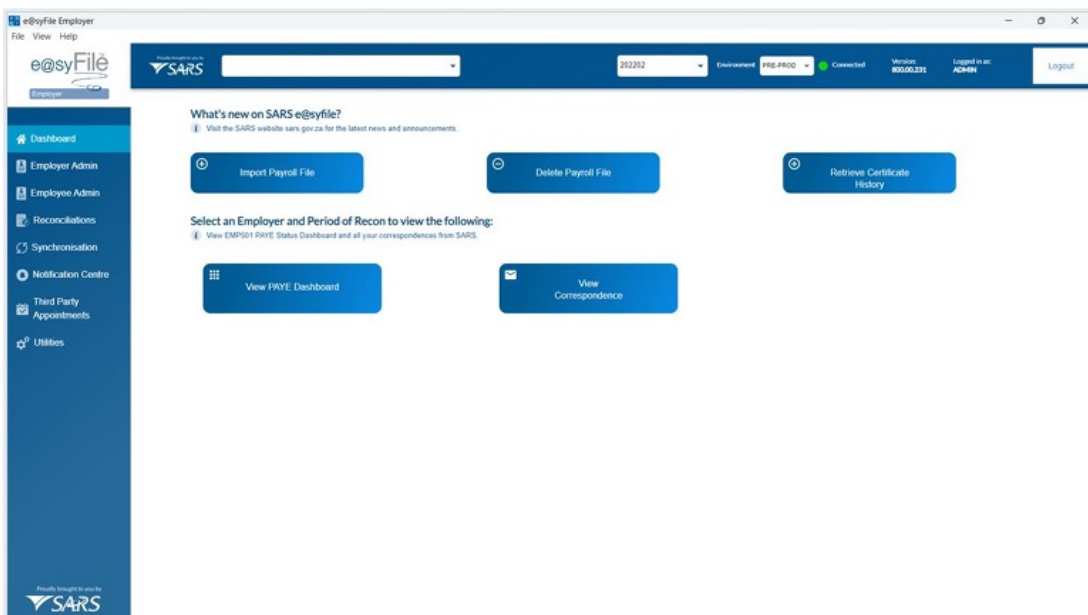
3. Select a backup file to retrieve historical data. This file must be saved on the local PC.
4. Provide the login name and password to allow decryption of the database. This is the same login information previously used to access the old e@syFile system.
5. Capture the PAYE Reference Number for an employer contained within the backup file, and the Period of Reconciliation for which the data must be imported.
6. Select Request Certificate Data.

#### **Q4:** *How do I retrieve Certificate History?*

**Response:** Follow the steps below to retrieve certificate history:

1. From the Dashboard, select Retrieve Certificate History.
2. You may select an Employer and Period of Reconciliation, although this is not required to access the function.

**Please note:** Employee records will only be retrieved for a reconciliation period if a certificate was created. As a result, an employee may appear in one reconciliation period but not in another.





3. Select a **backup file** to retrieve historical data. This file must be saved on the local PC.
4. Provide the **login name and password** to allow decryption of the database. This is the same login information previously used to access the old e@syFile system.
5. Capture the **PAYE Reference Number** for an employer contained within the backup file, and the **Period of Reconciliation** for which the data must be imported.
6. Select **Request Certificate Data**.

**Q5:** Can I still submit using the old e@syFile Employer application?

**Response:** Effective from 1 March 2025, all submissions must be made using the new e@syFile™ Employer application, including the 202502-recon submission.

All information regarding the use of the e@syFile Employer application can be found here: [PAYE-easyFileG01 - e@syfile™TMC Employer Guide - External Guide](#)

## Reminder regarding the enhancements to Tax Directives system – A new era of simplified, secure tax compliance, effective 11 April 2025

In a move that further strengthens SARS's 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.

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 took effect from 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.

### **Reminder regarding important banking institutions 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.

### **Reminder regarding the release of SARS' 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 2024 income tax and VAT verifications.
2. Delays in finalising and payment refunds.
3. Delays in finalising 2024 objections by not issuing the correct revised assessments as per the objection outcome.

## 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 10 - 16 April 2025.

## Upcoming RCB/SARS regional and national meetings

1. Mpumalanga Emalahleni Branch – 19 May 2025
2. Western Cape – 4 June 2025
3. Free State and Northern Cape – 9 June 2025
4. Eastern Cape – Gqeberha and Kareiga – 25 June 2025
5. Mpumalanga – 27 June 2025
6. Eastern Cape – Gqeberha and Kareiga – 13 August 2025
7. Free State and Northern Cape – 8 September 2025
8. Free State and Northern Cape – 10 November 2025 and
9. 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 2024	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

## Tax Directives: 2025 Legislative Changes and System Enhancements

As mentioned above, SARS has introduced a series of updates to the tax directive system, forms, and supporting documentation, reflecting the legislative changes for 2025. These enhancements aim to streamline processes, improve compliance, and align directive applications with the latest amendments to tax legislation.

### Key system enhancements and legislative updates:

1. **RST01 Tax Directive application form:** The application process for South African taxpayers seeking relief under a DTA has been fully automated. Individuals receiving pensions or annuities from a South African retirement fund can now submit their RST01 applications via eFiling. SARS will assess these applications within 21 working days to determine if tax exemption applies under the relevant DTA.
2. **IRP3(a) Tax Directive application form:** A new application reason—*Backdated (Antedated) Salaries and/or Pensions*—has been introduced. This update allows employers to provide accurate information for employees opting to be taxed under section 7A, where employees' tax accrued in prior tax years. Additionally, provisions for non-residents requesting DTA consideration on Savings Withdrawal Benefits have been included in the process.
3. **Form B Tax Directive application form**  
Two significant changes were made:

- The allowable transfer reasons for *Transfer – Unclaimed Benefit and Transfer – Inactive Member with Insufficient Information* have been updated.
  - The directive reason *Emigration Withdrawal* has been removed, following the deletion of its enabling provision effective 1 September 2024.
4. **Form C Tax Directive application form:** Similar to Form B, the *Emigration Withdrawal reason has been removed. A new directive reason—Transfer before Retirement [Par 2(1)(c)]—has been added.* Effective 1 March 2025, this allows a retirement annuity fund member who has reached the normal retirement age (as per fund rules), but who has not yet elected to retire, to transfer their interest to another retirement annuity fund.
  5. **IRP3(c) Tax Directive application form:** Trusts now have the ability to apply electronically for a tax directive permitting annuity providers not to withhold PAYE on annuities owned by a trust registered as an employer. Issued under paragraph 10 read with paragraph 11(a) of the Fourth Schedule to the Act, the trust will be responsible for accounting to SARS for any tax withheld from beneficiary payments.

### Updated guidance and resources:

To support the rollout of these changes, SARS has also updated several key guides:

- [IT-AE-33-G01 – Tax Directive Cease to be resident and Expiry of visas – External Guide](#)
- [IT-AE-41-G01 – Completion Guide for IRP3\(a\) and IRP3\(s\) Form – External Guide](#)
- [IT-AE-41-G02 – Guide to Complete the Tax Directive Application Forms – External Guide](#)
- [IT-AE-41-G04 – Guide to the Tax Directive functionality on eFiling – External Guide](#)

These changes reflect SARS' continued commitment to modernising its tax directive systems and improving the user experience for taxpayers and practitioners alike.

### 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.

### Other SARS and related operational publications and announcements

No other SARS and related operational publications and announcements were made in the week of 10 - 16 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 10 - 16 April 2025.

### 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 commenced 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

### Reminder that SARS has published 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](#).

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

No other tax practitioner access and functionality publications and announcements were made in the week of 10 –16 April 2025.

## PART B – LEGISLATION & POLICY

### LEGISLATION, INTERNATIONAL AGREEMENTS & POLICY

#### Tax policy & international agreements

### Reminder regarding the new Transfer Duty Rates that have taken effect in April 2025

#### New Transfer Duty Rates effective 1 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

No new National legislation was published in the week of 10 –16 April 2025.

## 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 10 – 16 April 2025.

### Legislative counsel publications

#### **SARS has published Interpretation Note 20 (issue 9) that opines on the additional deduction for learnership allowance**

SARS has published [Interpretation Note 20 \(issue 9\)](#), which provides updated guidance on the application of section 12H of the Income Tax Act. This section provides for tax deductions related to annual and completion allowances for employers participating in registered learnership agreements that meet the necessary criteria.

The latest issue reflects legislative changes brought in by the Taxation Laws Amendment Act No. 20 of 2021, effective from 1 April 2022, as well as further amendments introduced by the Taxation Laws Amendment Act No. 42 of 2024.

Under section 12H, employers may claim an annual allowance and a completion allowance for each qualifying learnership agreement entered into with an employee, provided the agreement is registered with a SETA and signed before 1 April 2027. The allowances differ based on the learner's qualification level, specifically whether the learner holds a National Qualifications Framework (NQF) level 1–6 or NQF level 7–10 qualification. In addition, the value of the deduction may vary depending on the learner's existing qualifications and whether the individual has a disability.

Members are encouraged to study the interpretation note for further details.

#### **Reminder that 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 recent regulations that were promulgated on 14 March 2025. As a result of these regulations, SARS has published two VAT-specific FAQ documents to assist vendors with queries relating to 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 aim 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

The following Tax Court cases have been published:

Date of delivery	Case	Relevant Legislation
11/02/2025	<a href="#">VAT 22558</a>	Value-Added Tax Act, 1991
<b>Keywords:</b> Whether the Insurer, in the providing of indemnity insurance in terms of the policy, was rendering 'services' to the Fund, in respect of which the Fund was entitled to deduct, as 'input tax', the VAT component of the premiums paid to the Insurer – Whether SARS's ultra vires argument has any merit – Whether SARS's 'invoices' argument has any merit.		
03/02/2025	<a href="#">IT 25209</a>	Tax Administration Act, 2011
<b>Keywords:</b> Whether SARS's averments in its rule 31 statement contravene rule 31(3), comprising a novation of the entire factual and legal basis of the assessment.		
24/05/2024	<a href="#">SARSTC IT 76704 (IT) [2024]</a> <a href="#">ZATC CPT (24 May 2024)</a>	Income Tax Act, 1962
<b>Keywords:</b> Whether SARS's rule 31 statement represented a fundamental and impermissible change of tack from its assessment and that sought to rescue SARS from the consequences of its refusal to accept the cogency of information provided to it.		
27/12/2024	<a href="#">2023/22</a>	Tax Administration Act, 2011
<b>Keywords:</b> Interlocutory application for default judgment: Whether SARS has shown good cause. There is also the issue of appropriate relief in the event the applicant succeeds.		
29/11/2024	<a href="#">IT 45776</a>	Income Tax Act, 1962 Tax Administration Act, 2011
<b>Keywords:</b> Prescription – deduction – penalty – USP – Interest – General Anti-avoidance rules		

## Other SARS publications and announcements

No other legislative publications or announcements were made by SARS during the week of 10 – 16 April 2025.

## OTHER MATTERS OF INTEREST FOR A TAX PRACTICE

### Call for Participation: Help Us launch the SAIT eFiling Working Committee

In February 2025, SAIT participated in the inaugural SARS eFiling workgroup meeting between SARS and the respective RCB's- an important step towards improving the eFiling system through collaboration with key stakeholders.



Following this, we launched an initiative to form a **SAIT eFiling Working Committee** to continue the conversation and help shape the future of eFiling. In the spirit of collaboration and continuous improvement, we are excited to relaunch the SAIT eFiling Working Committee- an initiative designed to keep the conversation going and help shape the future of the eFiling experience. SAIT is inviting passionate and solution-driven members of the tax community to get involved. Whether you have valuable insights, ideas for improvement, or personal experiences with the eFiling system, this is a unique opportunity to contribute to meaningful, lasting change.

The SAIT eFiling workgroup will discuss potential enhancements to the SARS eFiling system, make recommendations to be presented to the national SARS eFiling team, and participate in testing, among other duties. It is therefore imperative that the members of the SAIT eFiling working group demonstrate a comprehensive understanding of, and exhibit mastery in, the eFiling system.

Interested members are urged to email their motivational letter to [technical@thesait.org.za](mailto:technical@thesait.org.za) by Friday, 25 April 2025, expressing their interest.

This is an important step towards reigniting the conversation and working together to build a more efficient and practitioner-friendly eFiling system.

### **Reminder regarding SARS' Successful Implementation of Tax Directives Aligned with IBIR-006 Interface Specification v6.803**

SARS has successfully implemented the latest round of digital enhancements to the Tax Directives system, now aligned with the **IBIR-006 Interface Specification Version 6.803**.

These upgrades reflect an ongoing commitment to delivering clarity, consistency, and simplicity for taxpayers and traders alike. By enhancing digital infrastructure, the updates aim to make compliance easier while reinforcing the security and reliability of digital tax services.

SARS extends its appreciation through this [correspondence](#) to all stakeholders who collaboratively contributed to the successful trade testing phase. Their role played a key role in ensuring the solution is both effective and user-friendly. As part of a broader digital transformation strategy, this milestone is another step forward in streamlining taxpayer interactions and reinforcing trust in the system.