

25 July 2024

To: The South African Revenue Service

Lehae La SARS
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Via email: SARS: technicaltariff@sars.gov.za
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RE: COMMENTS ON THE DRAFT TARIFF AMENDMENTS PERTAINING TO SCHEDULE NO. 1 – 5

Dear Colleagues,

We refer to the above draft amendments as proposed by SARS. We set out below brief comments from SAIT Tax Technical pertaining to these draft amendments.

1. Draft amendment to Schedule 1: Insertion of new 8-digit tariff in Chapter 8 for-mangoes, dried grapes and pomegranates

Background

We understand that the envisaged changes as based on:

- the motivation received from the South African Subtropical Growers' Association (Subtrop) is to allow for the monitoring of imports and exports of mangoes and litchis, as this information is important in planning for future growth in the industry. We further understand that the tariff heading will be extended to 8 digits to include specific mention of Mangoes.
- A request from Raisins South Africa Non-Profit Company (Raisins SA) for the creation of separate 8-digit tariff subheadings in respect of dried grapes (raisins) classifiable under tariff subheading 0806.20.
- A request from the Pomegranate Association of South Africa (POMASA) for the creation of separate 8-digit tariff subheading for pomegranates. The requested 8-digit tariff subheadings will amongst other benefits enable the collection of the correct levies and to ensure accurate statistics.

Commentary

We are of the view that the above requests for the creation of additional 8-digit tariff subheadings are justifiable. We are therefore in support thereof.



2. Draft Amendment to Schedule 3: Deletion of the provisions of the old APDP (referred to as APDP I)

Background

The explanatory note provides a concise explanation and indicates that the old provisions of APDP have become redundant, as APDP II was implemented with effect from 1 July 2021.

Commentary

The deletion of the redundant provisions is welcome. We therefore have no further comment related thereto.

3. Draft Amendment to Schedule 4: Delete the provisions of the old APDP

Commentary

We understand that this is a consequential amendment to the deletion of the redundant APDP rebate provisions within Schedule 4. Therefore, this amendment is welcome and warrants no further comment.

4. Draft Amendment to Schedule 5: Delete the provisions of the old APDP

Background

We understand that this consequential amendment relates to the deletion the redundant APDP I refund item provisions within Schedule 5 and the substitution of Refund item 536.00 00000 04.00 to remove the redundant APDP I reference and insertion of the APDP II reference.

Commentary

This amendment is welcome and warrants no further comment.

5. Conclusion

We appreciate the opportunity to comment on these draft tariff amendments. Please do not hesitate to contact us should you require further information or clarification.

Yours faithfully,
SAIT Tax Technical



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