



Tax & Legal - News Alert

August 2023

Advance Pricing Agreement Programme

On 31 July 2023, National Treasury released [draft legislation](#) for a proposed Advance Pricing Agreement Programme. The draft law is included in the Draft Tax Administration Laws Amendment Bill, 2023, and it is envisaged that this regime will be included in a new Part IA, following Part I, of Chapter III of the Tax Administration Act. This follows a public discussion paper released in 2020 and subsequent further announcements, most recently in the 2023 Budget Speech.

The APA Programme will only enter into effect on a date to be announced by the Minister in the Government Gazette, and it is not clear when this will be.

It is contemplated that initially South Africa will only entertain bilateral APAs. The proposed legislation sets out the anticipated process, fees applicable, requirements etc. It is noteworthy that several items will require further clarification and detail, which are expected to be published in terms of public notices.

Comments are due by 31 August 2023, to be followed by public workshops and the release of National Treasury's response document.

For more information and assistance, please contact:



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