



# KPMG Asia Pacific Tax Weekly

KPMG Asia Pacific Tax Centre | 18 July 2023



## Asia Pacific Tax Developments

### Australia

#### [Consultation on draft bill aligning tax treatment of general insurers with AASB17](#)

Treasury released for consultation an exposure draft bill that seeks to implement the 2023-2024 budget measure “amending the tax law to reduce compliance costs for general insurers.”

#### [Digital games tax offset; compensation scheme of last resort; superannuation entity reporting requirements](#)

The federal government registered the Income Tax Assessment (Digital Games Tax Offset) Rules 2023 instrument, which sets out the rules on a range of matters related to the digital games tax offset (DGTO).

#### [Guidance on GST treatment of digital currency transactions](#)

The Australian Taxation Office released a series of guides on the goods and services tax (GST) treatment of digital currency transactions.

#### [Research and development tax incentives claim denied \(Federal Court decision\)](#)

The Federal Court held that the taxpayer did not qualify for research and development (R&D) tax incentives provided under the Industry Research and Development Act 1986 (IR&D Act 1986).

#### [Taxpayer’s “food” product subject to GST \(Administrative Appeals Tribunal decision\)](#)

The Administrative Appeals Tribunal held that the taxpayer’s yogurt product was subject to goods and services tax (GST) because it was properly characterized as food that is a combination of one or more foods, at least one of which is specifically subject to GST.



## India

### [Guidance on withholding tax on purchases of overseas tour packages and foreign remittances](#)

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The Central Board of Direct Taxes issued frequently asked questions regarding the implementation of the increase in the withholding tax under the Finance Act, 2023 (from 5 percent to 20 percent effective July 2023) on purchases of overseas tour packages and foreign remittances under the Liberalized Remittance Scheme.

## New Zealand

### [Tax Round Up: April - June 2023](#)

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KPMG in New Zealand provided a summary of tax developments and Inland Revenue publications that have been released in April through June 2023.

## Philippines

### [Availability of certain forms; venue for registering tax-free exchanges of properties](#)

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The Bureau of Internal Revenue (BIR) issued Revenue Memorandum Circular No. 60-2023 to circularize the availability of the enhanced BIR registration forms (Nos. 1901, 1902, 1903, 1904 and 1905) relative to the implementation of Ease of Doing Business and Efficient Government Service Delivery Act of 2018.

### [InTAX: July 2023 Issue 1 | Volume 1](#)

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Revenue Memorandum Order No. 23-2023 on June 2023, to provide for the mandatory requirements and guidelines, policies and procedures in the processing of claims for Value-Added Tax Credit/Refund except those under the authority and jurisdiction of the Legal Group.

### [Recent direct and indirect tax developments](#)

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The Bureau of Internal Revenue issued Revenue Memorandum Order and Revenue Memorandum Circulars such as RMO No. 23-2023, RMC No. 63-2023, RMC No. 69-2023, RMC No. 70-2023 and others.

### [Running of prescriptive period for VAT, applicability of VAT to interest income from affiliated loans](#)

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The First Division of the Supreme Court held that the three-year prescriptive period began running from the taxpayer's filing of its original value added tax (VAT) return, even the taxpayer subsequently amended the return, because the amendment was not "substantial."

## Singapore

### [Updated e-Tax Guide on total asset method for interest adjustment](#)

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The Inland Revenue Authority of Singapore updated its e-TaxGuide on the total asset method for interest adjustment.

## Sri Lanka

### [Proposed amendments to social security contribution levy](#)

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The government in July 2023 published the Social Security Contribution Levy (Amendment) Bill, which proposes amendments to the First Schedule (relating to exemptions) of the Social Security Contribution Levy Act, No. 25 of 2022.

## Thailand

### [New BOI measure to alleviate the impact of BEPS 2.0 Pillar 2 \(Global Minimum Tax\)](#)

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The Board of Investment (BOI) in Thailand publicly released a new BOI notification (No. 1/2566) on its website in May 2023. This new BOI notification concerns the impact of Thailand's tax holiday as it is aimed to alleviate the Top-up Tax impact on taxpayers that are in the Pillar 2 scope.



## Significant International Tax Developments

### [OECD: Outcome statement on BEPS 2.0](#)

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OECD released an Outcome Statement on the Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalization of the Economy, describing the progress made by 138 members of the OECD/G20 Inclusive Framework on base erosion and profit shifting on implementation of major reform of the international tax system.



## Calendar of events

Date	Event	Location
3 August 2023	<a href="#">e-Invoicing: The digital way forward</a>	Virtual
2 August 2023	<a href="#">Are you prepared for the looming BEPS 2.0 tax era?</a>	Singapore



## Beyond Asia Pacific

### [Mauritius: Direct and indirect tax measures in Finance Bill 2023](#)

The Finance (Miscellaneous Provisions) Bill 2023 has been released for consultation, and the draft legislation includes measures announced in the budget speech in June 2023.

### [Oman: Income tax treaty with Egypt signed](#)

Oman and Egypt in May 2023 signed an income tax treaty on income and capital. While the income tax treaty was ratified by Oman under Royal Decree RD 43/2023 (in June 2023), it is yet to be ratified by Egypt.



## TaxNewsFlash by region

**Africa**

**Americas**

**Europe**

**United  
States**



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