

GMS Flash Alert

2024-148 | July 15, 2024

Argentina – Moratorium Regime Established for Regularization of Tax Obligations

Argentina's Congress recently approved the introduction of a moratorium regime through a new tax reform law.¹ The tax reform had been known as "El Proyecto de Ley de Medidas Fiscales Paliativas y Relevantes" (Fiscal Package Law or "Palliative and Relevant Tax Measures" in English)² and is now enacted in law.^{3, 4}

In accordance with the new law (27.743/2024), a moratorium regime has been approved for implementation in respect of the regularization of overdue tax, customs, and social security liabilities for obligations due on or before March 31, 2024 inclusive, as well as for infractions committed up to said date related or not to those obligations.

WHY THIS MATTERS

It is important to note that individuals with tax debts in Argentina can avail of this new moratorium regime to regularize their accounts before the tax authority – benefitting from forgiveness and various ways of making payment(s).

If a taxpayer works with a qualified tax practitioner, it is advisable to consult with them to decide next steps.

More Details

The timeframe to adhere to the moratorium regime is 150 calendar days from the date of entry into force of the regulations issued by the tax authority.

The following benefits are established, with general scope, for taxpayers who avail of this regime, depending on the date of adherence and the chosen payment method.

Adherence to this regime within first 90 days from the date of entry into force:				
Days:	0-30	31-60	61-90	0-90
Forgiveness of:	Seventy percent (70%) of the interest accrued to the date of adherence to this regime	Sixty percent (60%) of the interest accrued to the date of adherence to this regime	Fifty percent (50%) of the interest accrued to the date of adherence to this regime	Forty percent (40%) of the interest accrued to the date of adherence to this regime
Payment method:	by cash payment or in a payment facility plan of up to three (3) monthly installments under the terms established by the tax authority for this purpose			by a payment facility plan that the tax authority will establish for this purpose
Facility plans advance payment and financial interest:	N/A			Individual taxpayers will make an advance payment equivalent to twenty percent (20%) of the debt and for the resulting balance of debt, up to sixty (60) monthly installments, setting a financing interest calculated based on the rate set by the National Bank of Argentina for commercial discounts that the regulations will specify

Adherence to this regime starting 91 days from the date of entry into force:	
Days:	91 - 150
Forgiveness of:	Twenty percent (20%) of the interest accrued to the date of adherence to this regime
Payment method:	By a payment facility plan that the tax authority will establish for this purpose
Facility plans advance payment and financial interest:	Individual taxpayers will make an advance payment equivalent to twenty percent (20%) of the debt and for the resulting balance of debt, up to sixty (60) monthly installments, setting a financing interest calculated based on the rate set by the National Bank of Argentina for commercial discounts that the regulations will specify

In all the above-mentioned cases, 100 percent of the fines applied will be forgiven.

Companies with globally-mobile employees – especially Argentine citizens situated abroad – who need to bring their tax affairs into order, should consult with their tax service professionals about the adherence process and paying their taxes under one of the possible alternatives, especially in cases where the tax balance payable is the responsibility of the employees.

FOOTNOTES:

- 1 *Ley de Medidas Fiscales Paliativas y Relevantes (Ley 27.743)*, promulgado por decreto 593/2024. Título I. Régimen de Regularización Excepcional de obligaciones tributarias, Aduaneras y de Seguridad Social (Moratoria y Plan de pagos).
- 2 See a [report/analysis](#) (in Spanish) from the *Oficina de Presupuesto del Congreso*.
- 3 Published in the online *Boletín Oficial de la República Argentina*: [Ley 27743 / Law No. 27,743](#).
- 4 Still pending tax authority regulations.

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