




## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
20/02/2019	IN 1 (Issue 3)	Provisional tax estimates	Income Tax Act, 1962	<del>Paragraph 19(3)</del> From Issue 2: Paragraphs 17 to 27 of the Fourth Schedule	Issue 1 dd 30/11/2001 Issue 2 dd 30/03/2016
17/03/2009	<del>IN 2 (Issue 3)</del>	<del>Foreign dividends: Deductibility of interest</del>	<del>Income Tax Act, 1962</del>	<del>Section 11C</del>	Issue 1 dd 02/02/2002 Issue 2 dd 28/08/2002 <b>Issue 3 dd 17/03/2009 withdrawn on 11 February 2016 – Section 11C was repealed with effect from 1 April 2012</b>
20/06/2018	IN 3 (Issue 2)	Resident: Definition in relation to a natural person - ordinarily resident	Income Tax Act, 1962	Section 1(1)	Issue 1 dd 04/02/2002
03/08/2018	IN 4 (Issue 5)	Resident: Definition in relation to a natural person - physical presence test	Income Tax Act, 1962	Section 1(1)	Issue 1 dd 04/02/2002 Issue 2 dd 28/08/2002 Issue 3 dd 08/02/2006 Issue 4 dd 12/03/2014
23/01/2006	<del>IN 5 (Issue 2)</del>	<del>Employees' tax: Directors of private companies (which include persons in close corporations who perform functions similar to directors of companies)</del>	<del>Income Tax Act, 1962</del>	<del>Paragraphs 1, 9(5) and 11C of the Fourth Schedule</del>	<del>Issue 1 dd 19/02/2002</del> <b>Issue 2 dd 23/01/2006 withdrawn on 6 March 2017 – Paragraph 11C of the Fourth Schedule was repealed with effect from 1 March 2017</b>
30/06/2023	IN 6 (Issue 3)	Resident – Place of effective management (companies)	Income Tax Act, 1962	Section 1(1)	<b>Issue 1 dd 26/03/2002 remained published on the Internet, and was only archived on 18 November 2018, to allow for reporting on periods of assessment before Issue 2 was issued.</b>  Issue 2 dd 03/11/2015
26/03/2002	IN 7	Restraint of trade payments	Income Tax Act, 1962	Sections 1, 11(cA), 23(f)	
28/08/2013	IN 8 (Issue 3)	Insolvent estates of natural persons	Income Tax Act, 1962	Section 25C	Issue 1 dd 28/03/2002 Issue 2 dd 26/03/2002
25/06/2018	IN 9 (Issue 7)	Small business corporations	Income Tax Act, 1962	Section 12E	Issue 1 dd 13/12/2002 Issue 2 dd 29/03/2004 Issue 3 dd 13/01/2006 Issue 4 dd 19/02/2007 Issue 5 dd 14/10/2009 Issue 6 dd 26/07/2016
27/08/2025	IN 10 (Issue 5)	Skills development levy exemption: Public benefit organisations	Skills Development Levies Act, 1999	Section 4(c)	Issue 1 dd 24/03/2003 Issue 2 dd 18/08/2015 Issue 3 dd 13/11/2018 Issue 4 dd 12/12/2022

 <b>Register of all Interpretation Notes</b>					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
06/02/2017	IN 11 (Issue 4)	Trading stock: Assets not used as trading stock	Income Tax Act, 1962	Sections 1, 22 From Issue 2: Paragraph (jA) of the definition of "gross income" in section 1(1)	Issue 1 dd 25/03/2003 Issue 2 dd 05/02/2014 Issue 3 dd 11/02/2015
27/03/2003	IN 12	<del>Recoupments: Assets in a deceased estate</del>	<del>Income Tax Act, 1962</del>	<del>Sections 8(4)(a), 25(1)</del>	Archived on 4 March 2021 – The legislative provisions dealing with deceased estates in the Income Tax Act, 1962 has been amended with effect from 1 March 2016
15/03/2011	IN 13 (Issue 3)	Deductions: Limitation of deductions for employees and office holders	Income Tax Act, 1962	Section 23(m)	Issue 1 dd 27/03/2003 Issue 2 dd 30/03/2005
30/03/2021	IN 14 (Issue 5)	Allowances, advances and reimbursements	Income Tax Act, 1962	Section 8(1)(a) and (c)  <b>From issue 2:</b> Section 8(1)(a), (b) and (c) and paragraph 1 of the Fourth Schedule	Issue 1 dd 27/03/2003 Issue 2 dd 08/01/2008 Issue 3 dd 20/03/2013 Issue 4 dd 18/03/2019
30/08/2024	IN 15 (Issue 6)	Exercise of discretion in case of late objection or appeal	Tax Administration Act, 2011	Sections 104 and 107 Section 106 removed from Issue 4	Issue 1 dd 18/06/2003 Issue 2 dd 08/11/2004 Issue 3 dd 10/07/2013 Issue 4 dd 20/11/2014 Issue 5 dd 21/12/2018
28/06/2021	IN 16 (Issue 4)	Exemption from income tax: Foreign employment income	Income Tax Act, 1962	Section 10(1)(o)(ii)	Issue 1 dd 27/03/2003 Issue 2 dd 02/02/2017 Issue 3 dd 31/01/2020
05/03/2019	IN 17 (Issue 5)	Employees' tax: Independent contractors	Income Tax Act, 1962	The Fourth Schedule	Issue 1 dd 28/03/2003 Issue 2 dd 09/11/2008 Issue 3 dd 31/03/2010 Issue 4 dd 14/03/2018
24/06/2020	IN 18 (Issue 4)	Rebate and deduction for foreign taxes on income  Previous title: "Rebate for foreign taxes: Natural Persons"	Income Tax Act, 1962	Section 6quat  Issue 3: sections 6quin and 64N added  Issue 4: sections 6quin and 64N deleted	Issue 1 dd 31/03/2003 Issue 2 dd 31/03/2009 Issue 3 dd 26/06/2015

 <b>Register of all Interpretation Notes</b>					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
24/06/2025	IN 19 (Issue 6)	Year of assessment of persons other than companies: Accounts accepted to a date other than the last day of February  Subject/title changes at issues 3 and 5	Income Tax Act, 1962	<del>Section 1(1) – Definition of "year of assessment", sections 5, 66(13A) and (13B) and 89quat and paragraph 21 of the Fourth Schedule</del>	Issue 1 dd 05/08/2003 Issue 2 dd 18/01/2006 Issue 3 dd 09/10/2013 Issue 4 dd 15/02/2016 Issue 5 dd 18/11/2020
10/04/2025	IN 20 (Issue 9)	Additional deduction for learnership allowance	Income Tax Act, 1962	Section 12H	Issue 1 dd 05/03/2004 Issue 2 dd 30/03/2007 Issue 3 dd 28/01/2010 Issue 4 dd 10/06/2011 Issue 5 dd 30/01/2015 Issue 6 dd 27/11/2015 Issue 7 dd 12/10/2017 Issue 8 dd 28/07/2021
09/03/2004	IN 21	The applicability of the regional establishment levy to dividends receivable by a holding company	Regional Services Act, 1985 (Act No. 109 of 1985)	Paragraph 1 – Definitions of "financial enterprise", "consideration" and "leviable transaction"; Paragraphs 5, 6, 13(5)	
30/12/2025	IN 22 (Issue 6)	Transfer duty exemption: Public benefit organisations and institutions, boards or bodies  Title changed from Issue 4	Transfer Duty Act, 1949 (Act No. 40 of 1949)	Section 9(1)(c) and (1A)	Issue 1 dd 11/03/2008 Issue 2 dd 09/12/2008 Issue 3 dd 22/09/2015 Issue 4 dd 30/01/2018 Issue 5 dd 23/09/2022
03/11/2004	IN 23	<del>Estimated assessments (foreign funds or assets)</del>	<del>Income Tax Act, 1962</del>	<del>Section 78(1A), (1B) and (1C)</del>	<b>Withdrawn with effect from 1 October 2012</b>
31/10/2023	IN 24 (Issue 5)	Public benefit organisations: Partial taxation  <b>Previous titles:</b> Issue 1 – Public benefit organisations (PBOs): Trading rules Issues 2 to 4 – Public benefit organisations: Trading rules – Partial taxation of trading receipts	Income Tax Act, 1962	Section 10 (1)(cN)	Issue 1 dd 19/03/2008 Issue 2 dd 31/08/2007 Issue 3 dd 04/02/2014 Issue 4 dd 12/02/2018
12/03/2014	IN 25 (Issue 3)	Resident: Definition in relation to a natural person - application of the physical presence test in the year of death or insolvency	Income Tax Act, 1962	Section 1(1); Definition of "resident"	Issue 1 dd 26/03/2004 Issue 2 dd 08/02/2006
30/03/2004	IN 26	Taxation of CCMA and Labour Court awards to employees and former employees	Income Tax Act, 1962	Section 1; Definition of "gross income"; paragraph (c), (d), (f); sections 74(4A) and 10(1)(x)	
04/02/2005	IN 27	Personal liability of employers, representative employers, shareholders and directors for outstanding employees' tax	Income Tax Act, 1962	Fourth Schedule	Issue 1 dd 19/03/2004


<div>  <div> <b>Register of all Interpretation Notes</b> </div> </div>					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
04/03/2022	IN 28 (Issue 3)	Deductions of home office expenses incurred by persons in employment or persons holding an office	Income Tax Act, 1962	Sections 11(a), 23(b) and (m)	Issue 1 dd 18/02/2005 Issue 2 dd 15/3/2011
19/02/2013	IN 29 (Issue 2)	Farming operations: Equalised rates of tax	Income Tax Act, 1962	Section 5(10); paragraph 19 of the First Schedule	Issue 1 dd 30/03/2005
05/05/2014	IN 30 (Issue 3)	<del>Documentary proof required on consignment o delivery of movable goods to a recipient at an address in an export country</del> <b>Name changed in Issue 3 to:</b> The supply of movable goods as contemplated in section 11(1)(a)(i) read with paragraph (a) of the definition of "exported" and the corresponding documentary proof	Value-Added Tax Act, 1991	Section 1(1), paragraph (a) of the definition of "exported" in section 11(1)(a)(i) and section 11(3)	Issue 1 dd 31/03/2005 Issue 2 dd 15/03/2006
09/03/2016	IN 31 (Issue 4)	Documentary proof required for the zero-rating of goods and services	Value-Added Tax Act, 1991	Section 11(3) read with section 11(1) and (2)	Issue 1 dd 31/03/2005 Issue 2 dd 30/03/2012 Issue 3 dd 22/03/2013
27/06/2005	IN 32 (Withdrawn)	<del>Public Benefit Organisations: Prudent investments</del>	<del>Income Tax Act, 1962</del>	<del>Section 30(3)(b) (11)(cc)</del>	<b>Withdrawn with effect from 01/04/2007 - refer to section 24(d) of Revenue Laws Amendment Act, 2006 (Act No. 20 of 2006)</b>
04/07/2025	IN 33 (Issue 6)	Assessed losses: Companies: The 'trade' and 'income from trade' requirements	Income Tax Act, 1962	Section 20(1)(a)	Issue 1 dd 04/07/2005 Issue 2 dd 30/06/2010 Issue 3 dd 04/02/2014 Issue 4 dd 22/07/2014 Issue 5 dd 05/05/2017
02/02/2017	IN 34 (Issue 2)	Exemption from income tax: Remuneration derived by a person as an officer or crew member of a ship	Income Tax Act, 1962	Section 10(1)(o)(i)	Issue 1 dd 12/01/2006
14/03/2023	IN 35 (Issue 5)	Employees' tax: Personal service providers and labour brokers	Income Tax Act, 1962	Paragraphs 1, 2(1A) and 2(5) of the Fourth Schedule and section 23(k)	Issue 1 dd 07/03/2006 Issue 2 dd 11/12/2007 Issue 3 dd 31/03/2010 Issue 4 dd 26/03/2017
<del>24/01/2007</del>	<del>IN 36</del>	<del>Scope and impact of section 76I upon written statements issued by the Commissioner prior to 1 October 2006</del>	<del>Income Tax Act, 1962</del>	<del>Section 76I</del>	<b>Withdrawn with effect from 8/2/2013</b>
<del>24/01/2007</del>	<del>IN 37</del>	<del>Procedures for requesting binding effect in respect of written statements issued by the Commissioner prior to 1 October 2006</del>	<del>Income Tax Act, 1962</del>	<del>Section 76I(4) and (5)</del>	<b>Withdrawn with effect from 8/2/2013</b>
<del>03/01/2007</del>	<del>IN 38</del>	<del>Application and cost recovery fees for binding private rulings</del>	<del>Income Tax Act, 1962</del>	<del>Section 76F</del>	<b>Withdrawn with effect from 8/2/2013 – refer to Public Notice 102, GG 36119 of 8/2/2013</b>
08/02/2013	IN 39 (Issue 3)	VAT treatment of public authorities and grants  <b>Previous title: "VAT treatment of public authorities, grants and transfer payments"</b>	Value-Added Tax Act, 1991	Sections 1(1), 8, 11, 16, 18 and 23 and 40A (from Issue 3)	Issue 1 dd 04/12/2007 Issue 2 dd 08/02/2013 – <b>Section 40A was repealed with effect from 25 January 2015</b>


## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
24/03/2016	IN 40 (Issue 3)	VAT treatment of the supply of goods and/or services to and/or from a customs controlled area of an industrial development zone	Value-Added Tax Act, 1991	Sections 1(1), 7, 8, 9, 10, 11, 12, 13, 18; Item 498.00 in paragraph 8 of Schedule 1	Issue 1 dd 04/12/2007 Issue 2 dd 30/03/2012
31/03/2014	IN 41 (Issue 3)	Application of the VAT Act to the gambling industry	Value-Added Tax Act, 1991	Sections 1(1), 8(13), 8(13A), 9(3)(e), 16(3)(a), (d) and (e), 17(2)(a), (c) and 72	Issue 1 dd 02/04/2007 Issue 2 dd 31/03/2008
12/12/2016	IN 42 (Issue 2)	The supply of goods and/or services by the travel and tourism industry	Value-Added Tax Act, 1991	Sections 7(1)(a), 11(1)(a) and 11(2)(f)	Issue 1 dd 02/04/2007
12/08/2021	IN 43 (Issue 8)	Circumstances in which certain amounts received or accrued from the disposal of shares are deemed to be of a capital nature  Previous title: "Circumstances in which amounts received or accrued on disposal of listed shares are deemed to be of a capital nature"	Income Tax Act, 1962	<del>Section 9B</del> Section 9C (from Issue 3 onwards)	Issue 1 dd 10/04/2007 Issue 2 dd 31/08/2010 Issue 3 dd 30/09/2011 Issue 4 dd 06/06/2012 Issue 5 dd 17/02/2014 Issue 6 dd 16/02/2017 Issue 7 dd 08/02/2019
27/08/2025	IN 44 (Issue 4)	Public benefit organisations: Capital gains tax	Income Tax Act, 1962	Paragraph 63A of the Eighth Schedule	Issue 1 dd 31/08/2007 Issue 2 dd 04/02/2014 Issue 3 dd 21/02/2020
25/03/2025	IN 45 (Issue 4)	Deduction of security expenditure	Income Tax Act, 1962	Sections 11(a) and (e), 18A, 22(8), 23(b) and (g) and 24D and <del>28(8)</del> , paragraphs 2(a), (b), (e), (f) and (h) of the Seventh Schedule, paragraphs 20 and 53 of the Eighth Schedule and Part II of the Ninth Schedule	Issue 1 dd 30/06/2008 Issue 2 dd 10/12/2014 Issue 3 dd 24/08/2018

## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
06/11/2012	IN 46 (Issue 4)	Amalgamation of amateur and professional sporting bodies	Income Tax Act, 1962	Sections 10(1)(c N), 11, 11E and 30 as amended	<p>Issue 1 dd 28/07/2008</p> <p>Issue 2 dd 18/02/2009</p> <p><b>Note:</b> Sections were amended by section 125 of Revenue Laws Amendment Act, 2007 as substituted by section 76(1) of Taxation Laws Amendment Act, 2008 and amended by section 132 of Revenue Laws Amendment Act, 2008</p> <p>Issue 3 dd 07/12/2009</p> <p>Issue 4 dd 06/11/2012 – archived on 23 June 2015 due to conditions and requirements on amalgamation transactions that have lapsed</p>
09/02/2021	IN 47 (Issue 5)	Wear-and-tear or depreciation allowance	Income Tax Act, 1962	Section 11E	<p>Issue 1 dd 28/07/2009</p> <p>Issue 2 dd 11/11/2009</p> <p>Issue 3 dd 02/11/2012</p> <p>Issue 4 dd 24/03/2020</p>
11/11/2009	IN 47A Notice of Modification	Notice of Modification of binding general ruling: IN 47 dated 2009/07/28	Income Tax Act, 1962	Section 76M	<b>Obsolete – Withdrawn with effect from 11/11/2009</b>
05/03/2018	IN 48 (Issue 3)	Instalment credit agreement and debtors' allowance	Income Tax Act, 1962	Section 24	<p>Issue 1 dd 28/07/2009</p> <p>Issue 2 dd 19/12/2014</p>
13/03/2013	IN 49 (Issue 2)	Documentary proof required to substantiate a vendor's entitlement to 'input tax' or a deduction as contemplated in section 16(2)	Value-Added Tax Act, 1991	Section 1 – Definition of the term 'input tax', read with section 16(1), (2) and (3)	<p>Issue 1 dd 29/07/2009</p> <p>Issue 2 dd 13/03/2013 <b>Withdrawn with effect from 01/04/2016</b></p> <p>The Interpretation Note will be incorporated into an Interpretation Note setting out the required documentary proof to be obtained and retained by a vendor to substantiate the vendor's entitlement to a deduction under section 16(3)(c)-(n)</p>
28/08/2009	IN 50	Deduction for scientific or technological research and development	Income Tax Act, 1962	Section 11D	


<div>  <b>Register of all Interpretation Notes</b> </div>					
South African Revenue Service					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
04/10/2023	IN 51 (Issue 6)	Pre-trade expenditure and losses	Income Tax Act, 1962	Sections 11, 11A and 23	Issue 1 dd 04/11/2009 Issue 2 dd 04/02/2014 Issue 3 dd 10/03/2014 Issue 4 dd 05/05/2017 Issue 5 dd 27/06/2018
10/03/2014	IN 52 (Issue 3)	Approval to end a tax period on a day other than the last day of a month	Value-Added Tax Act, 1991	Section 27(6); proviso (ii) and proviso (iii)	Issue 1 dd 14/12/2009 Issue 2 dd 30/04/2013
20/01/2025	IN 53 (Issue 4)	Limitation of allowances granted to lessors of affected assets	Income Tax Act, 1962	Section 23A	Issue 1 dd 12/02/2010 Issue 2 dd 18/03/2020 Issue 3 dd 09/10/2015
25/01/2017	IN 54 (Issue 2)	Deductions: Corrupt activities, fines and penalties	Income Tax Act, 1962	Section 23(o)(i) and (ii)	Issue 1 dd 26/02/2010
30/03/2011	IN 55 (Issue 2)	Taxation of directors and employees on vesting of equity instruments	Income Tax Act, 1962	Sections 8C and 10(1)(nD); paragraph 11A of the Fourth Schedule; paragraph 2(a) of the Seventh Schedule	Issue 1 dd 30/03/2010
31/03/2014	IN 56 (Issue 2)	Recipient-created tax invoices; credit and debit notes	Value-Added Tax Act, 1991	Sections 20(2) and 21(4)	Issue 1 dd 31/03/2010
31/03/2010	IN 57	Sale of an enterprise or part thereof as a going concern	Value-Added Tax Act, 1991	Sections 8(7) and (16), 11(1)(e) and 18A	
12/05/2022	IN 58 (Issue 3)	The <i>Brummeria</i> case and the right to use loan capital interest free	Income Tax Act, 1962	Section 1, Definition of "gross income"	Issue 1 dd 30/06/2010 Issue 2 dd 04/10/2012
25/03/2025	IN 59 (Issue 3)	Tax treatment of the receipt or accrual of government grants <b>Previous title: "Tax implications of the receipt or accrual of government grants and government scrapping payments"</b>	Income Tax Act, 1962	Section 1 – Definition of "gross income"; sections 10 and 23(n)	Issue 1 dd 10/12/2010 Issue 2 dd 12/05/2022
10/01/2011	IN 60 (Issue 2)	Loss on disposal of qualifying depreciable assets	Income Tax Act, 1962	Sections 11(o), 20B and 24M(1)	Issue 1 dd 10/01/2011
29/03/2011	IN 61	Remission of interest in terms of section 39(7)(a)	Value-Added Tax Act, 1991	Section 39(7)(a)	
30/03/2011	IN 62	Broad-based employee share plan	Income Tax Act, 1962	Sections 8B, 10(1)(n C) and 11(IA)	
12/08/2015	IN 63 (Issue 2)	Rules for the translation of amounts measured in foreign currencies other than exchange differences governed by section 24I and the Eighth Schedule	Income Tax Act, 1962	Sections 1, 6quat, 9A, 9D(6), 9G and 25D. Sections 1(1), 6quat(4) and (4A), 6quin(4), 9A, 9D(6), 25D, 35A(5), 47J, 49H, 50H, 51H and 64N(4)	Issue 1 dd 19/09/2011

 <b>Register of all Interpretation Notes</b>					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
30/12/2025	IN 64 (Issue 5)	Income tax exemption: Bodies corporate, share block companies and associations of persons managing the collective interests common to all members  Previous title: "Income tax exemption: Bodies corporate established under the Sectional Titles Act, No. 95 of 1986, share block companies established under the Share Blocks Control Act, No. 59 of 1980 and associations of persons managing the collective interests common to all members"  Issue 1 dd 22/02/2012 replaced Income Tax Practice Note 8 of 2001	Income Tax Act, 1962	Section 10(1)(e)	Issue 1 dd 22/02/2012 Issue 2 dd 06/11/2012 Issue 3 dd 17/08/2015 Issue 4 dd 13/11/2018
06/02/2017	IN 65 (Issue 3)	Trading stock: Inclusion in income when applied, distributed or disposed of otherwise than in the ordinary course of trade	Income Tax Act, 1962	Section 22(8)	Issue 1 dd 24/02/2012 Issue 2 dd 05/02/2014
01/03/2012	IN 66	Scholarships or bursaries  Replaced Practice Note 17 of 12 March 1993	Income Tax Act, 1962	Section 10(1)(q) and the Seventh Schedule	Issue 1 dd 01/03/2012
28/01/2020	IN 67 (Issue 4)	Connected persons	Income Tax Act, 1962	Section 1(1) – Definition of "connected person"	Issue 1 dd 01/11/2012 Issue 2 dd 14/02/2014 Issue 3 dd 08/12/2017
08/12/2020	IN 68 (Issue 3)	Provisions of the Tax Administration Act, 2011, that did not commence on 1 October 2012 under Proclamation No. 51 (GG 35687)	Tax Administration Act, 2011	Chapter 12 and Schedule 1	Issue 1 dd 16/11/2012 Issue 2 dd 07/02/2013
26/06/2025	IN 69 (Issue 4)	Game Farming	Income Tax Act, 1962	Section 26 and First Schedule Section 9HA, 25 and 25C (from issue 3 onwards)	Issue 1 dd 12/02/2013 Issue 2 dd 23/11/2017 Issue 3 dd 06/08/2021
14/03/2013	IN 70	Supplies made for no consideration	Value-Added Tax Act, 1991	Section 1 – Definitions of "enterprise", "taxable supply", "input tax", "donation" and "consideration", section 10(4) and 10(23)	
14/03/2013	IN 71	Long service awards	Income Tax Act, 1962	Paraphs 2(a), 5(2)(b) and 5(4) of the Seventh Schedule	
22/03/2013	IN 72	Right of use of motor vehicles	Income Tax Act, 1962	Paragraph 7 of the Seventh Schedule	
20/12/2017	IN 73 (Issue 3)	Tax implications of rental income from tank containers	Income Tax Act, 1962	Sections 11(a), 11(e), 20(1), 23A and 25D	Issue 1 dd 24/04/2013 Issue 2 dd 14/12/2015
16/05/2023	IN 74 (Issue 3)	Deduction and recoupment of expenditure on repairs	Income Tax Act, 1962	Sections 11(d) and 8(4)(a)	Issue 1 dd 06/08/2013 Issue 2 dd 14/12/2015
11/02/2020	IN 75 (Issue 4)	Exclusion of certain companies and shares from a "group of companies" as defined in section 41(1)	Income Tax Act, 1962	Sections 1 and 41(1)	Issue 1 dd 24/03/2013 Issue 2 dd 22/09/2014 Issue 3 dd 11/02/2020



## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
26/02/2014	IN 76	Tax treatment of tips for recipients, employers and patrons	Income Tax Act, 1962	Section 1(1) – Definition of the term "gross income" Fourth Schedule – paragraph 1 definitions of "remuneration", "employer", "employee", "provisional taxpayer"; paragraph 2(1)	
04/03/2014	IN 77	Taxable benefit: Use of employer-provided telephone or computer equipment or employer-funded telecommunication services	Income Tax Act, 1962	Paragraph 2(b), (e) and (h); Paragraphs 6, 10 and 31(1) of the Seventh Schedule	
29/07/2014	IN 78	Allowance for future expenditure on contracts	Income Tax Act, 1962	Section 24C	
06/08/2021	IN 79 (Issue 3)	Produce held by nursery operators <a href="#">Issue 1 dd 22/09/2014 replaced Practice Note 32 of 7 October 1994</a>	Income Tax Act, 1962	<del>Sections 25, 25C and 26; Paragraphs 2, 3, 4 and 9 of the First Schedule; Paragraphs 40 of the Eighth Schedule</del> From issue 2: Sections 9HA, 25, 25C and 26 Paragraphs 2, 3, 4 and 9 of the First Schedule	Issue 1 dd 22/09/2014 Issue 2 dd 23/11/2017
05/11/2014	IN 80	The income tax treatment of stolen money	Income Tax Act, 1962	Section 11(a), (c); Section 23(c), (g); Section 1(1) – Definition of "gross income"	
09/04/2015	IN 81 (Issue 2)	The supply of goods and services by professional hunters and taxidermists to non-residents	Value-Added Tax Act, 1991	Section 7(1)(a); Section 11(1)(a); Section 11(2)(l)	Issue 1 dd 12/03/2015
25/03/2015	IN 82	Input tax on motor cars <a href="#">Replaced on 26/03/2015 – The last bullet point under Purpose was removed</a>	Value-Added Tax Act, 1991	Sections 1(1), 17(2)(c) and 18	
30/09/2024	IN 83 (Issue 3)	Application of sections 20(7) and 21(5)	Value-Added Tax Act, 1991	Sections 20(4), (5), (7), 21(1) and (5)	Issue 1 dd 26/03/2015 Issue 2 dd 09/04/2015
26/03/2015	IN 84	The value-added tax treatment of bets	Value-Added Tax Act, 1991	Sections 8(13), 9(3)(e), 10(17) and 16(3)(d)	
27/03/2015	IN 85	The Master Currency case and the zero-rating of supplies made to non-residents	Value-Added Tax Act, 1991	Section 11(2)(l)	
28/07/2021	IN 86 (Issue 3)	Additional investment and training allowances for industrial policy projects	Income Tax Act, 1962	Section 12I	Issue 1 dd 08/12/2015 Issue 2 06/02/2018

 <b>Register of all Interpretation Notes</b> South African Revenue Service					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
29/05/2020	IN 87 (Issue 3)	Headquarter companies	Income Tax Act, 1962	Section 1(1) – Definition of "headquarter company", and <del>6quat(1A) and (1C), 9D(2), 9H, 9I, 10(1)(k)(i), 10B, 20C, 24(3), 25D(4) and (7), 31(5), 41(1) – Definition of "company", 49D(c), 50D(1)(a)(i)(cc) and 64E(1); and paragraphs 11(2)(b), 43(1A) and (6A) and 64B(2) and (4) of the Eighth Schedule</del>	Issue 1 dd 19/02/2016 Issue 2 dd 28/11/2018
19/02/2016	IN 88	Tax deduction for amounts refunded	Income Tax Act, 1962	Section 11(nA)	
01/03/2016	IN 89	Maintenance orders and the tax-on-tax principle <a href="#">This Note withdraws General Note 37</a>	Income Tax Act, 1962	Section 7(11)	
24/06/2025	IN 90 (Issue 3)	Year of assessment of a company: Accounts accepted to a date other than the last day of a company's financial year	Income Tax Act, 1962	Sections 1(1), Definition of "financial year" and "year of assessment", 5, and 66(13C), <del>89quat(1) and paragraph 23 of the Fourth Schedule</del>	Issue 1 dd 15/08/2016 Issue 2 dd 18/11/202
30/12/2025	IN 91 (Issue 3)	Concession or compromise of a debt <b>Previous title: "Reduction of debt"</b>	Income Tax Act, 1962	Section 19 and paragraph 12A of the Eighth Schedule	Issue 1 dd 21/10/2016 Issue 2 dd 20/07/2022
24/10/2016	IN 92	Documentary proof prescribed by the Commissioner	Value-Added Tax Act, 1991	Sections 16(2)(f) and 16(3)(c) to (n)	
17/05/2021	IN 93 (Issue 3)	The taxation of foreign dividends	Income Tax Act, 1962	Sections 1(1) – Definition of "foreign dividend", <del>6quat</del> , 9(4)(a), 9D(9)(f), and 10B, <del>22(3)(a)(iii), 23(f), 23(g) and 25D and paragraph 20(1)(h)(iii) of the Eighth Schedule</del>	Issue 1 dd 24/11/2016 Issue 2 dd 17/01/2019
19/12/2016	IN 94	Contingent liabilities assumed in the acquisition of a going concern	Income Tax Act, 1962	Sections 1(1) (Definition of "gross income") and 11(a), and paragraph 35(1) of the Eighth Schedule	
04/07/2024	IN 95 (Issue 3)	Deduction for energy-efficient savings	Income Tax Act, 1962	Sections 12L	Issue 1 dd 24/02/2017 Issue 2 dd 11/01/2019
21/07/2017	IN 96	Exemption from income tax: Remuneration derived by a person as an officer or crew member of a South African ship	Income Tax Act, 1962	Section 10(1)(o)(iA)	

## Register of all Interpretation Notes


Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
05-Jul-22	IN 97 (Issue 3)	Taxation of REITs and controlled companies	Income Tax Act, 1962	Sections 1(1) – Definition of "REIT" and 25BB, 8F(2) and (3)(d), 8FA(2) and (3)(d), 9C(2) and (5), paragraph (aa) of the proviso to section 10(1)(k)(i), 11(a), 11(x), 23N(5), 24J(2), 41 to 47, 64E(1), 64F(1)(a) and (l) and (2), 64FA(1)(a); paragraph 20(3)(a) of the Eighth Schedule; sections 2(1) and 8(1)(f) of the Securities Transfer Tax Act; sections 1(1) – Definition of "residential property company", 2(1) and 9(1)(f) of the Transfer Duty Act; and sections 2, 7(1)(a), 12(a) and 17(1) of the Value-Added Tax Act	Issue 1 dd 08/12/2017 Issue 2 dd 18/11/2020
05/08/2024	IN 98 (Issue 2)	Public benefit organisations: The provision of funds, assets or other resources to any association of persons	Income Tax Act, 1962	Sections 30(1), (3)(f) and Public Benefit Activity 10 in Part I of the Ninth Schedule	Issue 1 dd 07/02/2018
30/03/2020	IN 99 (Issue 3)	Unclaimed benefits <a href="#">General Note 35 withdrawn by Issue 1</a>	Income Tax Act, 1962	Paragraph 4 of the Second Schedule	Issue 1 dd 21/02/2018 Issue 2 dd 11/10/2019
0506/2018	IN 100	Meaning of "extracted"	Mineral and Petroleum Resources Royalty Act, 2008	Sections 1 and 6A(1)(b)	

## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
12/07/2023	IN 101 (Issue 2)	Gains or losses on foreign exchange transactions  Previous title: "Section 24I – Gains or losses on foreign exchange transactions"	Income Tax Act, 1962	<del>Sections 24I and sections 1(1) – definition of "trading stock", 3(4)(b), 6quat (4), 8(4)(a), 9(2)(f), 9(4)(e), paragraph (c)(ii) and (iii) of the proviso to section 9D(2A), 9D(6), 9D(9)(fA)(ii) and (iii), 9D(9A)(a)(iii), 11(a), 11(f), 11(j), 19, 20(2), 22(3)(a)(i), 24J(2), (3) and (5A) and 25D, paragraphs 12A, 35(3)(a) and 43 of the Eighth Schedule and paragraph 4(1) of the Tenth Schedule</del>	Issue 1 dd 04/07/2018
12/05/2022	IN 102 (Issue 2)	Classification of risk policy  Previous title: "Classification of risk policy and the once-off election to transfer certain policies or classes of policies issued before 2016 to the Risk Policy Fund"	Income Tax Act, 1962	Section 29A	Issue 1 dd 17/07/2018
14/09/2018	IN 103	The value-added tax treatment of supplies of international and ancillary transport services	Value-Added Tax Act, 1991	Section 11(2)(a), (b), (c), (d) and (e)	
04/10/2018	IN 104	Exemption – Foreign pension and transfers	Income Tax Act, 1962	Section 10(1)(gC)(ii)	
29/04/2024	IN 105 (Issue 2)	Deductions in respect of buildings used by hotelkeepers	Income Tax Act, 1962	Section 13bis	Issue 1 dd 28/11/2018
14/07/2023	IN 106 (Issue 2)	Deduction in respect of certain residential units	Income Tax Act, 1962	Section 13sex	Issue 1 dd 20/12/2018
16/08/2023	IN 107 (Issue 2)	Deduction in respect of commercial buildings	Income Tax Act, 1962	Section 13quin	Issue 1 dd 20/12/2018
24/01/2019	IN 108	Meaning of "bulk" in Schedule 2	Mineral and Petroleum Resources Royalty Act, 2008	Schedule 2	
16/08/2023	IN 109 (Issue 2)	Lease premiums	Income Tax Act, 1962	Paragraph (g) of the definition of "gross income" and section 11(f) and (h)	Issue 1 dd 07/02/2019
16/08/2023	IN 110 (Issue 2)	Leasehold improvements	Income Tax Act, 1962	Paragraph (h) of the definition of "gross income" and section 11(g) and (h)	Issue 1 dd 07/02/2019
18/03/2019	IN 111	No-value provision in respect of the rendering of transport services by any employer	Income Tax Act, 1962	Paragraph 10(2)(b) of the Seventh Schedule	

## Register of all Interpretation Notes

Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
31/10/2023	IN 112 (Issue 2)	Section 18A: Audit certificate	Income Tax Act, 1962	Section 18A(2B) and (2C)	Issue 1 dd 21/06/2019
03/03/2020	IN 113	Apportionment of surplus and minimum benefit requirements: Pension Funds Second Amendment Act	Income Tax Act, 1962	Section 1(1) – Definitions of "pension" and "provident funds" and paragraph 2C of the Second Schedule	
02/03/2021	IN 114	Interaction between section 25B(1) and section 7(8) ) in case of conflict, inconsistency or incompatibility	Income Tax Act, 1962	Sections 25B(1) and 7(8)	
30/06/2023	IN 115 (Issue 2)	Withholding tax on interest	Income Tax Act, 1962	Sections 50A to 50H	Issue 1 dd 23/04/2021
23/04/2021	IN 116	Withholding tax on royalties	Income Tax Act, 1962	Sections 49A to 49H	
17/05/2021	IN 117	Taxation of the receipt of deposits	Income Tax Act, 1962	Section 1(1) – Definition of "gross income"	
04/11/2021	IN 118	Value-added tax consequences of points-based loyalty programmes	Value-Added Tax Act, 1991	Section 1(1) Definitions of "consideration", "input tax", and "supply", sections 7 and 10	
29/09/2025	IN 119	Deductions in respect of improvements to land or buildings not owned by a taxpayer	Income Tax Axt, 1962	Section 12N and 12NA	Issue 1 dd 12/05/2022
17/05/2022	IN 120	Prohibition of deductions in respect of certain intellectual property	Income Tax Axt, 1962	Section 23I	
13/06/2022	IN 121	Deduction of medical lump sum payments	Income Tax Axt, 1962	Section 12M	
18/08/2022	IN 122	Public benefit activity: Bid to host or hosting of any international event	Income Tax Axt, 1962	Paragraph 11(b) in Part I in the Ninth Schedule	
26/09/2022	IN 123	Effect on the date of issue of a share arising from a change in the redemption features	Income Tax Axt, 1962	Section 8E	
29/09/2022	IN 124	Public benefit organisations: Provision of residential care for retired persons	Income Tax Axt, 1962	Paragraph 3(c) in Part I of the Ninth Schedule	
14/11/2022	IN 125	Associations: Funding requirement	Income Tax Axt, 1962	Section 30B(2)(b)(ix)	
02/12/2022	IN 126	Extraordinary dividends treated as income or proceeds on the disposal of certain shares	Income Tax Axt, 1962	Section 22B and paragraph 43A of the Eighth Schedule	
17/01/2023	IN 127	Determination of the taxable income of certain persons from international transactions: Intra-group loans	Income Tax Axt, 1962	Section 31	
17/04/2023	IN 128	Definition of "associated enterprise"	Income Tax Axt, 1962	Section 31	
24/05/2023	IN 129	Understatement penalty: Meaning of "maximum tax rate applicable to the taxpayer"	Tax Administration Act, 2011	Section 222(5)	
08/06/2023	IN 130	Exemption for international aid received or accrued under an official development assistance agreement	Income Tax Axt, 1962	Section 10(1)(yA)	
29/04/2024	IN 131	Exemption of income relating to South African ships used in international shipping	Income Tax Act, 1962	Section 12Q	

 <b>Register of all Interpretation Notes</b>					
Publication Date	IN Number (and Issue Number)	Subject (Keywords)	Relevant Act	Relevant section(s) or other reference	Versions & Original Publication Dates
29/07/2024	IN 132	Persons not eligible to register as a tax practitioner and deregistration of registered tax practitioners for tax non-compliance	Tax Administration Act, 2011	Section 240(3)(d)	
15/08/2024	IN 133	Income tax exemption: Water services provider	Income Tax Act, 1962	Sections 1(1) and 10(1)(f)(ix)	
26/09/2024	IN 134	Disposal of assets by deceased person, deceased estate, and transfer of assets between spouses	Income Tax Act, 1962	Sections 9HA, 9HB and 25	
22/10/2024	IN 135	Sale and leaseback arrangements	Income Tax Act, 1962	Sections 23D and 23G	
21/01/2025	IN 136	Public benefit organisations: Non-professional sport and recreation	Income Tax Act, 1962	Paragraph 9 in Part I of the Ninth Schedule	
26/03/2025	IN 137	Recoupment of amounts deducted or set off when an asset commences to be held as trading stock	Income Tax Act, 1962	Sections 8(4)(a) and 8(4)(k)(iv)	
28/03/2025	IN 138	Determining the calorific value of coal for purposes of the royalty	Mineral and Petroleum Resources Royalty Act, 2008	Section 4(2) and Schedule 2	
22/08/2025	IN 139	Taxation of amounts received by or accrued to missionaries	Income Tax Act, 1962	Section 1(1) – Definition of “gross income”	
16/10/2025	IN 140	Diminution in the value of closing stock	Income Tax Act, 1962	Section 22(1)(a )	
31/10/2025	IN 141	The meaning of reserve fund under section 23(e )	Income Tax Act, 1962	Section 23(e )	
12/12/2025	IN 142	Meaning of “similar finance charges”	Income Tax Act, 1962	Paragraph (a ) of the definition of “interest” in section 24J(1)	
13/01/2026	IN 143	Income tax exemption: Registered political party	Income Tax Act, 1962	Section 10(1)(cE)	