KPMG
10 Customhouse Quay
P.O. Box 996
Wellington
New Zealand

Telephone +64 (4) 816 4500
Fax +64 (4) 816 4600
Internet www.kpmg.com/nz

Better Business Tax
C/- Deputy Commissioner, Policy and Strategy
Inland Revenue Policy and Strategy
P O Box 2198
Wellington

Our ref 160530KPMGSubBusTax

30 May 2016

Dear Sir

KPMG Submission - Making Tax Simpler: Better Business Tax

KPMG is pleased to make a submission on the Officials' Issues Paper "Making Tax Simpler: Better Business Tax" ("the Issues Paper").

1 General comments and summary of our submission

We broadly support the proposals contained in the Issues Paper to:

- increase and extend the use-of-money interest ("UOMI") threshold;
- remove application of UOMI at the first and second provisional tax instalment payments (if the standard "uplift"-based method is used);
- allow an Accounting Income Method ("AIM") for calculating provisional tax;
- remove the incremental late payment penalty; and
- simplify various tax adjustments for small business.

We believe these changes will reduce business compliance costs and stress, in particular, from getting provisional tax exactly right.

We offer qualified support for:

- modernising the withholding tax rules and their extension to labour-hire companies; and
- greater information sharing involving credit reporting of tax debt.

Notwithstanding our general support, we note the following:

- The need for the UOMI proposals highlights, we believe, fundamental issues with the current rate setting process and Inland Revenue's approach to interest.
  - UOMI is a finance charge for the party that does not have use of the funds. Instead, the current rate setting process makes this an explicit penalty.

© 2016 KPMG, a New Zealand partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

  - In our experience, Inland Revenue's approach has been to see UOMI underpayment interest as revenue to be collected rather than an excessive cost of not forecasting tax perfectly. This requires a mind-set change by Officials, in our view. The UOMI proposals are a useful first step. They should not be the last.

- In light of the above, while we support removing the application of UOMI at the first and second provisional tax instalments, this should not be limited to those applying the standard (uplift) method. Where a taxpayer undertakes a fair and reasonable estimation (supported by appropriate accounting forecasts), UOMI should also not apply. This would address the need for consistency between the uplift and estimation methods and/or between members of the same group or related parties. It would also provide larger taxpayers (those with turnover of more than $5 million) with the benefit of the AIM method.

- We support the broad principle underpinning the AIM method, which is to base provisional tax payments on a business's actual profitability throughout the year. However, this is complicated by the need to preform tax adjustments at the time of the AIM calculation and payment (and also the various consistency and other requirements when applying the AIM). This simply adds to the compliance costs that the proposal is trying to alleviate. In particular, given the targeting of the proposal (SMEs, i.e. turnover of less than $5m), there needs to be acceptance of some inaccuracy. We therefore recommend tax rule changes to align accounting and tax profit for AIM purposes.

- We note that the widening and tightening of the contractors' withholding tax rules are aimed at self-management and providing earlier access to information. The Issues Paper also foreshadows future expansion of those rules.

  - While we support the ability for contractors to self-assess their withholding rate, without informing Inland Revenue, we believe the proposed 10% minimum rate for resident contractors and 45% non-declaration rate are too high.

  - It is not clear whether a minimum 15% rate for non-resident contractors will mean that they will no longer be able to apply for certificates of exemption. We strongly recommend that certificates of exemption be retained (e.g. if income is DTA relieved).

  - The application of the contractor rules to companies may impact their cash flow (and their access to funding if a minimum of 10% of incoming cash-flows will be payable to Inland Revenue). It will also move Inland Revenue to the front of the creditor queue.

  - From a practical perspective, there may be additional compliance costs for businesses using different contractors as they will potentially need to accommodate multiple withholding rates in their systems. This will add to business compliance costs.

- We see merit in Inland Revenue providing information to the Companies Office on serious offences by company directors (this mirrors current information sharing with the Police).

- However, the credit reporting of tax debt needs to be carefully managed. On the one hand, there are advantages in the relevant business's suppliers and funders (and potential suppliers/funders) having access to information on any outstanding obligations with Inland

Revenue. On the other hand, any misreporting by Inland Revenue, or misuse by the credit reporting agency, will have significant commercial implications for the business involved. Therefore, there needs to be clear guidance on how these situations will be managed, including sanctions for offenders and redress for those affected.

- More importantly, we note that the Business Transformation consultation on the Tax Administration framework has asked the question more generally around changes to taxpayer secrecy. In our view, it is better that this general consideration of what is, and is not, appropriate for Inland Revenue to share should precede any further specific changes to the rules.

Our detailed comments and submissions on the Issues Paper follow:

2 Changes to provisional tax to increase certainty

2.1 UOMI safe harbour threshold

We support increasing the current UOMI safe harbour threshold from $50,000 to $60,000 of residual income tax ("RIT") and extending it to non-individual taxpayers (i.e. businesses, trusts, and other non-natural persons). This is a timely increase in the threshold, which was previously raised from $35,000 RIT.

This increase will take more small taxpayers, including micro and small businesses, outside the interest rules and reduce the associated compliance costs.

We further believe there should be a mechanism to automatically update the UOMI safe harbour threshold for inflation.

Also of concern, but not addressed in the Issues Paper, is the $2,500 RIT threshold for becoming a provisional taxpayer. This equates to less than $9,000 of business or other income from which tax has not been withheld (at the 28% tax rate). It is well beyond time for this threshold to be raised to a more reasonable level (e.g. $5,000 or $7,500).

2.2 UOMI safe harbour for all taxpayers using the standard method

The issues paper proposes applying UOMI to over and underpayments of provisional tax from the third instalment date for taxpayers using the standard ("uplift") method.

We are strongly supportive of the proposal to provide a UOMI safe harbour for the first ("P1") and second ("P2") provisional tax instalments. In our experience, taxpayers find it difficult to get the provisional tax instalments right at P1 and P2 due to the complexity and uncertainty associated with projecting what annual income will be before the income year has finished. (That said, an estimate is still likely to be 'more correct' than simply applying the uplift method.)

Deferring any UOMI risk until the third instalment date ("P3"), which is after the end of the relevant income year, should mean taxpayers are in a better position to calculate their tax position and get this right for the year. This would therefore provide greater certainty and fairness to taxpayers.

This change will create a powerful incentive for taxpayers to use the standard method to mitigate their potential UOMI risk. It will not be helpful where a taxpayer estimates that their financial performance will be worse than in the prior year (or compared to two years previously). They will then face the decision of whether to safeguard against any interest exposure, by paying a higher amount, or managing their cash-flows.

Given this inequitable result, we consider the extended safe harbour rules should not be limited only to those who use the standard method for P1 and P2. A better alternative would be to modify the rules to allow "fair and reasonable estimations" of provisional tax to receive the benefit of the UOMI safe harbour rules.

That is, if a taxpayer has made a fair and reasonable estimation based on the best information available at the time, and has provided support (e.g. a tax calculation based on forecast accounting and financial information) for their estimation at P1 and P2, UOMI on over and underpayments of provisional tax should not apply at those instalment dates. If this is the case, P3 would become a wash-up, and UOMI should only apply from this date, as per the Issues Paper proposal.

Our alternative would still require taxpayers to estimate their provisional tax on a fair and reasonable basis. As taxpayers would need to provide the basis on which they estimated P1 and P2, Inland Revenue should be able to determine if the estimate is reasonable and, if not, UOMI would still apply. Shortfall penalties could also apply if a taxpayer's provisional tax forecasts are significantly different to the actual results without a suitable explanation for the variance.

If our submission is accepted, Inland Revenue should approach an estimation from the default position that the taxpayer has attempted to get it right rather than reviewing estimates at each instalment (and with the benefit of hindsight for previous instalments). We also consider that the provision of supporting documentation will provide Inland Revenue with earlier information. This is an appropriate trade-off for allowing estimates.

This alternative approach recognises that those taxpayers who attempt to get it right, but do not do so perfectly, should not face the excessive cost of UOMI, and therefore unfairness or uncertainty, due to economic volatility.

This would also mitigate the need for the proposed consistency requirement at P2 (i.e. the proposal to limit the ability to switch from the standard method to the estimation method to prior to P2) and across related entities (as each entity's provisional tax calculation would be assessed separately on the merits).

We consider that our modification to the rules would provide greater fairness for taxpayers facing different financial and economic situations and would also meet the objectives of provisional tax: to collect *broadly* the right amount of tax throughout the year.

2.3 Consistency requirements – for associated persons

We understand Officials' desire for consistency of provisional tax calculation methods for associated persons. The Issues Paper refers to a group of companies under section IC 3 of the ITA 2007 and shareholder employees. It is not clear whether this consistency requirement is

also intended to apply to associated persons more widely – e.g. a trust whose settlor owns more than 25% of a company that uses the standard method?

Consideration needs to be given to what occurs commercially, compared to the theoretical risk of 'gaming'. Group companies may well use different provisional tax calculation methods, for commercial reasons. For example, it makes little sense to incur the time and cost to estimate provisional tax for a subsidiary that has nominal taxable income, compared to the main operating entity (whose financial results may be variable). In this situation, use of the standard method would require the same method to be applied for the main operating entity and vice versa.

As noted above, our proposed modification to the UOMI safe harbour proposal would make this consistency requirement largely redundant.

2.4 Consistency requirements – switching between methods

We believe taxpayers should be able to switch between the standard and estimation methods, as the aim should be to enable taxpayers to pay provisional tax based on as near a reflex of their accounting income / financial performance as possible. As noted above, to the extent their estimate of provisional tax is fair and reasonable based on the information available at the time, UOMI should not apply at P1 or P2.

We would expect taxpayers to use the standard method for P1, as it is difficult to have a reliable estimate of tax at that point. P2 is the more likely time for a taxpayer to estimate. Changing to an estimations basis would mean that the P1 as well as the P2 payment would be exposed to UOMI. We consider that taxpayers should not have that risk provided the estimate is a fair and reasonable one, as an estimate at P2 will be a better reflection of their tax liability.

2.5 Reassessments

We support the proposed approach of applying UOMI on the basis that the correct assessment (at P1 and P2) has been paid in the year concerned. We note that this would still leave exposure at P3, which is an appropriate incentive.

2.6 Remissions

Where the reassessment arises due to the correction of a genuine error, which the taxpayer has voluntarily disclosed, the Commissioner should have the ability to remit UOMI. (This could be within a maximum timeframe from filing the original return to reduce the risk.) We note the current rules are severely limited in this regard.

2.7 Tax payments within group companies

We support the ability for group companies to make provisional tax payments for one group entity and to make transfers to other group members at the end of the year, and qualify for the UOMI safe harbour proposal.

3 More accurate and timely payment of provisional tax

In principle, we are supportive of the AIM proposal, which will use accounting information generated to calculate the income tax liability for the same period that GST is calculated.

We note the following:

- The AIM will effectively split the income year into multiple periods equal to a business's GST filing frequency. It will also bring forward tax payments and information filing requirements to match. This may be a significant change to existing business processes. The upside is that businesses will have an earlier "line of sight" of their tax position and better accounting information.
- For the AIM to achieve its objectives of minimising compliance costs, existing tax principles need to be amended to align with accounting principles as much as possible.
- The Issues Paper proposal requires tax adjustments to be made in each of the relevant accounting periods and possibly also at year-end (through a wash-up mechanism). There needs to be some acceptance of inaccuracy as a trade-off for lower compliance costs for taxpayers from applying the AIM. Ultimately, the AIM is still a method of calculating provisional tax, for which perfect accuracy is not practically feasible.
- While we expect accounting software providers to be able to automate some tax adjustments, this will not be feasible for those where some degree of user (i.e. taxpayer) input will be necessary. To minimise the number of adjustments, tax rule changes are required to align accounting and tax profit.
- We recommend that "temporary" tax adjustments to accounting income (e.g. use of tax depreciation rates / adjustments to provisions for bonuses and holiday pay) be omitted from the AIM, as these are timing adjustments that will unwind over time. Only "permanent" adjustments, such as for 50% non-deductibility of entertainment expenditure and capital receipts/payments should be required. (Note: whether or not tax adjustments are made at each AIM instalment could be optional, to allow those with more sophisticated accounting systems to comply.) One area where a hybrid approach may be necessary is foreign exchange movements (e.g. if a taxpayer has applied the expected value method, rather than following IFRS, as this may have a material impact on tax payable under the financial arrangements rules).
- We believe the need for alignment is particularly justified if the AIM is to be limited to taxpayers with turnover of $5 million or less. (At a minimum, there should be no tax adjustments to accounting income for those taxpayers not required to prepare general purpose financial accounts – i.e. where Inland Revenue's minimum financial reporting requirements apply instead.)
- We see no reason why the AIM should not be available to those taxpayers with a turnover of more than $5 million. In practice, the AIM is likely to be of most benefit to taxpayers with highly volatile income, such as managed funds. (However, we note that managed funds already have a form of the AIM in the Portfolio Investment Entity regime). If the AIM is

made available to "larger" taxpayers, we acknowledge there may be a case for requiring tax adjustments to accounting income (as these adjustments could have a more material financial effect and accounting systems can be expected to be more sophisticated). This may result in "dual" AIM rules for SMEs and larger businesses.

- The Issues Paper suggests that the AIM should be limited to taxpayers that use accounting software packages that meet certain prescribed requirements, are capable of filing information electronically to Inland Revenue, and can map the data points required (to generate so-called "interim 10s"):
  - We agree that a business's accounting system should meet certain minimum standards for the AIM to apply. However, we do not believe that an accounting software package needs to be "cloud based", or a particular off-the-shelf product, to qualify. (Our concern is the potential for this to limit providers of AIM-compatible accounting systems.) Taxpayers with bespoke accounting systems and processes should also be able to utilise the AIM method by certifying that their packages meet the minimum requirements.
  - The AIM will put pressure on accounting information and processes as the frequency of filing will mean that the accounting system will be more heavily relied upon. The old adage, "garbage in, garbage out", applies here. In particular, this might limit the usefulness of any interim 10 data (e.g. if there are a number of year-end adjustments required in addition to more frequent interim 10 filings).
- Tax payments will become more frequent under the AIM (potentially up to twelve times a year if a monthly GST filer). This will have an adverse cash-flow impact which may make the AIM less attractive, particularly for those businesses for which regular cash-flow is not assured. In particular, we note with caution the limited uptake (at least among KPMG's smaller clients) of the GST-ratio method for calculating provisional tax, which also aligned the number of provisional tax payment dates with GST. It is not clear whether the lessons of that particular initiative have been fully taken on board when designing the AIM.
- The Issues Paper lacks detail on the following points:
  - It is not clear whether payments made under the AIM will be final or "provisional". On the one hand the AIM is referred to as another provisional tax calculation option. On the other, there is a suggestion that a terminal tax payment will not be required due to the accuracy of the AIM.
    - Treating AIL instalments as "final" will require perfection of information in accounting systems (e.g. all tax adjustments being made and "straight-lining" of accrued expenditure during the year). This will not be the reality, particularly if our submission to align tax and accounting is not adopted. (That will still require a year-end tax square up.) We therefore believe a terminal payment date will still be necessary.
    - The Issues Paper is also not clear what Inland Revenue's expectation for audit or verification of information received under the AIM would be. Also, what

ability Inland Revenue would have to challenge any information or payments received during the year, as well as any end of year assessment.

- The Issues Paper is not clear on the need to file a year-end tax return under the AIM. The Issues Paper suggests that confirmation of a pre-populated return may be required instead. This also assumes that all tax adjustments are accurately reflected in the interim 10s, which appears unlikely. (This also raises questions about the status of intra-year adjustments and the status of non-confirmations – e.g. will these be treated as default assessments?) In our view, the current annual income tax return is still likely to be required, to allow tax adjustments to be made at year-end.

- We note the Issues Paper asks a number of detailed questions about the AIM method, such as the appropriate software specifications, how often records are updated in accounting software and the level of accuracy taxpayers can expect from software in the treatment of tax adjustments. We believe these issues are better left to be addressed by software developers.

3.1 Paying tax as agent for shareholder-employees

We support the proposal to allow companies to pay, as agent, provisional tax on salary and wages paid to shareholder-employees.

We assume that shareholder employees, on whose behalf the company has paid provisional tax, will be removed automatically from the provisional tax regime. This is not clear from the Issues Paper and should be made explicit. (There is mention of companies deducting provisional tax on shareholder employee salaries at the average or marginal tax rate of the employee, under the estimation method, which suggests the employee should also be safe harboured if the uplift method is used, but the position is unclear.)

It is not clear how the proposed rule would work in an insolvent liquidation of the company. That is, where a company has deducted provisional on behalf of shareholder employees prior to liquidation (and has adjusted employees' drawings accordingly). Technically, the amount "deducted" would be treated as income tax of the company, not an amount held in trust for another person (such as PAYE or GST). This will have implications for shareholder employees, who may find their net drawings are lower (by the amount of provisional tax paid by the company) but will still face a liability on their gross earnings.

On a broader point, if a company pays provisional tax for multiple entities, and subsequently liquidates, would the related entities be required to pay back the liquidator? At what point will the tax payments become the payer or recipient's money? There may be some scope for using the existing trust rules – i.e. when a trust pays tax on beneficiaries – to clarify these points.

We support the extension of this proposal to partnerships, although this could add to the complexity of those rules. However, the decision whether to opt in should be for partners (and the partnership) to make.

We also support allowing greater balance date flexibility. The key issue is individuals, who are not in business, having to file on a standard balance date basis. There should be no restriction on companies and shareholders having the same balance date.

It is not clear how an extension of this approach to other payment types, such as rents, interest and dividends would apply (and whether this is warranted, particularly, given the application of the RWT rules at present to interest and dividends, which achieves the same outcome).

4 Self-management and integrity

We support allowing contractors the ability to self-assess their withholding tax rates. We believe this proposal should incentivise greater compliance by contractors (compared to the current withholding rate options, which can be penal, while the process to request a special rate certificate from Inland Revenue can be time consuming).

We do not support a minimum withholding tax rate for resident contractors however. A 10% minimum rate assumes a margin of approximately 30% on a contract payment. In our view, this seems excessive. If a minimum rate is desired, this should be set lower (say around 5%). (While Officials' concern seems to be that this may incentivise selection of the lowest possible rate, in practice, we expect that most contractors will accurately self-assess to avoid an end of year tax bill.)

Similarly, the proposal to increase the non-declaration contractor rate from 20% to 45% seems overly harsh. We do not believe that the PAYE non-declaration rate is the appropriate benchmark as contractors can deduct their business costs (i.e. unlike employment income, the payment is gross not "net").

The current withholding tax regime allows non-residents to request a certificate of exemption from Inland Revenue (e.g. if relieved from New Zealand taxation under a Double Tax Agreement). It is not clear whether this exemption regime will continue under the proposed regime for contractors. (The Issues Paper recommends a minimum 15% withholding tax rate for non-resident contractors, which suggests not.) We strongly recommend that the exemption certificate regime continue.

We view these withholding proposals not as an end but potentially a starting point for inclusion of more business taxpayers in the withholding tax rules (as the Business Transformation process continues). This has the following implications:

- Imposing a 10% minimum withholding tax rate on each payment to a resident contractor will mean there is reduced cash-flow to support their business (including funding). This will have an economic impact as more contractors are included in the rules.
- The application to labour hire firms will move Inland Revenue to the front of the queue as a secured creditor of those businesses.
- The inclusion of labour hire firms within the contractors' withholding tax rules will change the dynamics of current engagements. For compliant contractors (currently paying provisional tax on contract receipts) this will be a new set of rules to understand and apply.

- For New Zealand businesses using contractors, there will be withholding system impacts. There may be multiple rates to apply if different contractors are hired. This will encourage automation which will come at a cost for business. The systems change costs of this proposal should not be underestimated. Accordingly, we do not expect there to be significant uptake of the voluntary withholding option.

5 Making the system fairer

The proposal to remove the 1% monthly incremental late payment penalty for income tax, provisional tax, GST, and family assistance liabilities is supported.

However, we consider the current penalties regime is excessive particularly when combined with UOMI. Inland Revenue needs to consider whether the current compliance and penalties framework is generating the desired outcome, given the increasing amount of penalties debt (which is generally non-collectible and ends up being written-off).

6 Improving the operation of markets through greater tax transparency

The Business Transformation consultation has previously discussed the general policy behind taxpayer secrecy. That consultation also discussed current restrictions on information sharing by Inland Revenue. Any specific erosion of taxpayer secrecy through information sharing must be justified in terms of that general policy. On this point, we refer to our submission on *"Making Tax Simpler: Towards a New Tax Administration Act"* available here.

We submitted that public policy may, on occasion, justify information being shared with other Government agencies for purposes other than tax administration. However, we noted that any wider benefits from information sharing should be subsidiary to ensuring the integrity of the tax system (and taxpayers' perceptions of that integrity). This remains our view.

We have identified two major risks to the tax administration from the proposals:

1. they may provide a disincentive for taxpayers to comply with their tax obligations; and
2. there may be a lack of appropriate checks and balances on the powers.

In respect of the first risk, we understand that Inland Revenue has carried out its own research into taxpayers' compliance behaviour. Provided that the research suggests no or very little risk to compliance from the proposals, we support them.

In respect of the second risk, the concern is that information sharing powers may be used as leverage, a threat or a penalty in a dispute. Legislation should make clear how the powers are to be exercised and that they are not to be used for those coercive purposes.

6.1 Information sharing with credit-reporting agencies

We provide qualified support for the proposal to allow Inland Revenue to disclose certain taxpayer related information to credit reporting agencies (i.e. credit reporting of tax debt).

The sharing of tax debt information needs to be carefully managed. On the one hand, there are advantages in the relevant business's suppliers and funders (and potential suppliers/funders) having access to information on any outstanding obligations with Inland Revenue.

However, any misreporting by Inland Revenue or misuse by the credit reporting agency will have significant commercial implications for the business involved. Therefore, there needs to be clear guidance on how these situations will be managed, including sanctions for offenders and redress for those affected.

Rightly or wrongly, there is a perception that Inland Revenue does not hold the most accurate information on file, and there have been numerous cases where taxpayers have been given incorrect or other taxpayers' details. This does not engender trust in Inland Revenue's systems or processes for information sharing.

It should be made clear that information sharing with credit-reporting agencies will be limited to those subject to the Credit Reporting Privacy Code 2004 (with those rules enhanced as required).

We agree with the proposed safeguards, including limiting information sharing to "significant taxpayer debt" that is not in dispute.

As a practical matter, we note there may be a delay between the creation of tax debt in Inland Revenue's system, the reporting of that debt to credit reporting agencies, and the use of the information by prospective lenders. There needs to be a process to ensure that any shared information is updated by Inland Revenue on a timely basis (with a similar requirement imposed on the credit reporting agency to update their records and information communicated to any third parties).

6.2 Information sharing with the Companies Office

We support this proposal, without qualification. Currently, Inland Revenue can share information with the Police in relation to serious crimes punishable by at least four years' imprisonment. The offences about which information will be shared under the proposals are punishable by up to five years' imprisonment. The proposals will therefore bring information sharing about company law offences in line with general criminal law.

7 Making the system simpler

We support the proposals to simplify tax for SMEs, in particular:

- Allowing an income tax "private expenditure" adjustment for motor vehicles available to one or two shareholder-employees, instead of requiring FBT returns and payments.
- Using standard value deductions rather than requiring apportionment of actual costs for motor vehicles and premises used privately.
- We note that the Issues Paper is unclear whether (and how) the "mixed-use asset" rules would apply to each of these proposals.
- Increasing the threshold for self-correction of errors from $500 to $1,000 of tax. While we are supportive of increasing the threshold, we believe this should be part of a broader review of the process for correction of errors. For errors that have a tax effect of greater than $500 (or $1,000 under the new proposal) there is no option but to make a voluntary disclosure (or

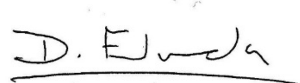
section 113 request) to Inland Revenue. The compliance costs and administration costs associated with the voluntary disclosure (and section 113) process are high. We recommend setting the self-correction threshold by reference to materiality for a particular taxpayer (e.g. tax effect of the error as % of their total tax liability, or gross or net income), or introducing self-correction rules which allow taxpayers to self-correct errors, but with compulsory disclosure in the relevant tax return. This would allow Inland Revenue to further investigate issues of interest.

- Removing the annual renewal requirement for RWT exemption certificates.
- Allowing more employers to file FBT annually by raising the PAYE threshold from $0.5m to $1m.
- We do not support making the deductibility of accrued employee remuneration paid within 63 days of year-end optional (to remove the compliance costs of calculating this amount). Given the 63 day adjustment is a temporary tax difference only (i.e. a matter of timing as the deduction will ultimately be allowed), we consider the better option is to simply allow the deduction, with the exception of accrued shareholder-employee income which is not recognised as taxable income in the same income year. This carve-out is necessary to ensure that deferral advantages are not sought due to a difference between deduction and income for related entities.

8 Further information

Please do not hesitate to contact us, John Cantin, on 04 816 4518, or Darshana Elwela, on 09 367 5940, if you would like to discuss our submission in greater detail.

Yours sincerely



John Cantin
Partner

Darshana Elwela
National Tax Director