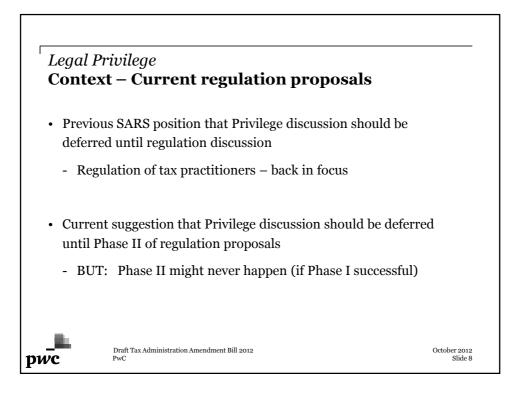


Registration of tax practitioners Recognised controlling bodies (clause 58)				
Draft Tax Administration Amendment Bill 2012	October 2012 Slide 4			

Registration of tax practitioners Recognised controlling bodies (clause 58)				
 Concern : Will there be sufficient time from enactment to due date for : SARS to formally recognise controlling bodies; <i>and</i> tax practitioners to register 	<u>Submission</u> Postpone to 1-Jul-13 (or later)			
Draft Tax Administration Amendment Bill 2012 PWC PwC	October 2012 Slide 5			

Provisional tax penalties	visional tax penalties			
Provisional Tax Penalty (Clause 15)				
 Para 20(1)(<i>a</i>): Penalty if underestimate by taxpayer <u>Current law</u>: SARS must first consider the taxpayer's calculations before imposing penalty <u>Proposal</u>: Automatic penalty (no review by SARS) BUT No opportunity for taxpayer to request remission 	Submission Discretion to remit penalty should be extended			
Draft Tax Administration Amendment Bill 2012 PwC PwC	October 2012 Slide 6			

Legal Profes Regulation of tax practitioners is back in focus	 sional Privilege <u>Submission</u> Legal privilege must be debated as part o Consider The current regulation proposal is the context for this debate Rationale for privilege Why tax practitioners? Additional commentary 	5
Draft Tax Ad PwC	ministration Amendment Bill 2012	October 2012 Slide 7





Why sh	ofessional ould tax ed tax p	advice	e privile	ege extend to	
Same rat for com legal pr		-	list area law	Development of co law not kept pace realities of modern	with
	Non-lawyers have right of appearance in Tax Court Tax practitioners fulfil a vital role, including in taxpayer compliance				
	Most tax ad provided non-lawye	by competitive advantage between		e advantage between	
_L	Draft Tax Administrat PwC	ion Amendment Bi	ll 2012		October 2012 Slide 10



