



# 2020-2021 Fiji National Budget

The 2020-2021 Fiji National Budget was today presented to the nation by the Attorney-General and Minister for Economy, Civil Service and Communications, Honourable Aiyaz Sayed-Khaiyum.

This Budget is for the 1 August 2020 to 31 July 2021 fiscal year and seeks to build on key measures introduced in the COVID-19 Response Budget to support economic recovery, private sector activity, protect jobs, assist the unemployed and overall macro-fiscal sustainability.

PricewaterhouseCoopers is pleased to provide this synopsis of the 2020-2021 Fiji National Budget. A more detailed report of the 2020-2021 Fiji National Budget will also be issued.

Should you have any queries on the Budget or our Synopsis, please do not hesitate to contact us.

## 2020-2021 Budget Estimates: Snapshot

	2020-2021 Budget
Estimated revenue (\$ million)	1,673.6
Estimated expenditure (\$ million)	3,674.6
Estimated Net Deficit (\$ million)	(2,001.0)
Debt repayments (\$ million)	(749.5)
Gross deficit (\$ million)	(2,750.5)
Net deficit as a percentage of GDP	-20.2%
Nominal GDP (\$ million)	9,905.3

Source: Supplement to the 2020-2021 Budget Address

The Fijian economy is estimated to have contracted by 1.3% in 2019. In 2020, the Fijian economy is projected to contract by 21.7%. The economy is projected to rebound in 2021 and 2022 by 14.1% and 6.5%, respectively.

The 2019 year-end annual inflation was -0.9%. Inflation in June 2020 stood at -3.5%. Year-end inflation for 2020 is expected to be 1.0%. Inflation for 2021 is forecast at around 1.4% and 2.0% in 2022.

In 2019, total exports grew by 2.7 percent to \$2,167.8 million. In 2020, total exports are projected to contract by 23.9%. In 2021, total exports are anticipated to recover by 14.4%. In 2022, total exports are projected to expand by 10.5%.

Total imports fell by 8.6 percent to \$5,075.8 million in 2019 and is projected to decrease by 30.1% to \$3,546.4 million in 2020. In 2021 and 2022, total imports (excluding aircraft) are estimated to grow by 13.8% and 10.0%, respectively.

## Tax Measures

Unless otherwise specified, excise tax, fiscal import duty, import excise duty and Environment Climate Adaptation Levy ("ECAL") changes are expected to be effective from 18 July 2020 and all other tax changes are expected to be effective from 1 August 2020, unless stated otherwise.

#### **Direct Tax Measures**

Policy	C	Description					
Social Responsibility     and Environment & C	Tax ( OICT )	The ECAL component of SRT will be reduced from 10% to 5%. The new SRT and ECAL structure will be as follows:					
Adaptation Levy ("EC	AL")	Chargeable Income	SRT	ECAL <sup>1</sup>			
		270,001 – 300,000	13% of excess over \$270,000	5% of excess over \$270,000			
		300,001 – 350,000	5,400 + 14% of excess over \$300,000	5% of excess over \$300,000			
		350,001 – 400,000	14,900 + 15% of excess over \$350,000	5% of excess over \$350,000			
		400,001 – 450,000	24,900 + 16% of excess over \$400,000	5% of excess over \$400,000			
		450,001 – 500,000	35,400 + 17% of excess over \$450,000	5% of excess over \$450,000			
		500,001 – 1,000,000	46,400 + 18% of excess over \$500,000	5% of excess over \$500,000			
		1,000,000 +	161,400 + 19% of excess over \$1,000,000	5% of excess over \$1,000,000			
2. Advance Payments o	•	<ul> <li>The rules for advance tax payments as amended in the COVID-19 Response Budget will be made permanent.</li> <li>Companies will be required to make advance tax payments in 9 instalments at the rate of 11½%.</li> <li>Additionally, the application of penalties was removed in the COVID-19 Response Budget and was valid until 31 December 2020. This waiver continues to apply for the next 3 years.</li> </ul>					
3. Debt Forgiveness	•	<ul> <li>As announced in the COVID-19 Response Budget, debt forgiveness is not subject to income tax for all debt outstanding forgiven from 1 April 2020 up to 31 December 2020.</li> <li>The existing policy and the forgiveness period for the new debt is extended until 31 December 2021.</li> <li>In addition, debts created between 1 April 2020 to 31 December 2021 (and forgiven) will also be eligible for income tax exemption under the debt forgiveness provisions.</li> </ul>					
4. Thin Capitalisation	•	The debt-to-equity ratio will be increased from the current 2:1 to 3:1.  The formula is the control of the current in the cur					

<sup>1</sup> We understand ECAL will apply at 5% on income exceeding \$270,000 and not as noted in this table. This needs to be appropriately clarified.

Policy Description							
5.	Depreciation write-off incentive	•	for Bu In	A 100% write-off on purchase of fixed assets of up to \$10,000 used for business purposes was announced in the COVID-19 Response Budget.  In light of the current economic situation, this policy will be made permanent.			
6.	Accelerated Depreciation	<ul> <li>A 100% write-off for the construction of a new commercial and industrial building, provided that approvals are obtained prior to 31 December 2020, was made available in the COVID-19 Response Budget.</li> <li>This incentive will be made permanent.</li> </ul>					
	Tax deduction for reduction of commercial rent	<ul> <li>As part of the government assistance package to businesses, a tax deduction was accorded to landlords for reduction of commercial rent. The deduction applied to existing rental contracts whereby landlords need to provide record of rental income received for the past 6 months.</li> <li>The reduction refers to the rent payable after 01 April 2020 to 31 December 2020.</li> <li>This tax deduction will be further extended until 31 December 2021.</li> </ul>					
8.	New Medical Investment Incentive	Th i.		xisting package will be repealed and replaced with the following:  rivate Hospital  Income tax exemption for the establishment of a new hospital based on the following capital investment levels:			
				Capital Investment (\$)	Tax Holiday		
				\$2,500,000 - \$5,000,000	7 years		
				\$5,000,001 - \$10,000,000	13 years		
				More than \$10,000,000	20 years		
				An investment allowance will be available for the refurbishment, renovation and extension of a hospital based on the following capital investment levels:			
				Capital Investment (\$)	Tax Deduction		
				\$500,000 - \$1,000,000	30%		
				More than \$1,000,000	60%		
		ii	An •	Income tax exemption for the es medical service centre based on investment levels:			
				Capital Investment (\$)	Tax Holiday		
				\$500,000 - \$3,000,000	7 years		
				\$3,000,001 - \$10,000,000	13 years		
				More than \$10,000,000 20 years			
			•	An investment allowance will be renovation and extension of an a based on the following capital in	ancillary medical service centre		
				Capital Investment (\$)	Tax Deduction		
				\$500,000 - \$1,000,000	30%		
				More than \$1,000,000	60%		

Policy	Description			
New Incentive Package for Subdivision of lots	A new incentive package will be intro- business of sub-division of lots for re- purpose. The following benefits will light	esidential or commercial		
	Capital Investment (\$)	Tax Deduction		
	Less than \$1,000,000	20%		
	\$1,000,001 - \$3,000,000	30%		
	\$3,000,001 - \$7,000,000	40%		
	More than \$7,000,000	60%		
	Duty concession will be available on equipment and machinery for the es			
	<ul> <li>Income tax exemption will be availal proceeds of sale.</li> </ul>	ole on developer profits for		
	The new Incentive Package for Sub- applicable from 1 August 2020 to 31			
New Incentive Package for Private sector investment in buildings	<ul> <li>A new incentive package will be intro investing in buildings to be used by approved by government.</li> </ul>			
	The following benefits will be available.			
	<ul> <li>Duty concession will be available materials, plant, machinery and establishment of the project.</li> <li>Tax exemption will be available</li> </ul>	d equipment for the		
<ol> <li>Residential Housing Development Incentive – Development of Housing for Public Rental</li> </ol>	Development Package) Regulations include duty concessions for the imp	Development Package) Regulations 2016 will be extended to include duty concessions for the importation of raw materials, machinery and equipment for the establishment of the housing		
12. Tax incentives for Corporate Bonds	To support post COVID-19 recovery avenues for corporate financing, the will be incentivized as follows:			
	<ul> <li>A 150% tax deduction will be a of corporate bonds with the So (SPSE). This deduction will be</li> <li>A 150% tax deduction will be a corporate bonds.</li> <li>Interest income earned on corporate tax.</li> </ul>	uth Pacific Stock Exchange applied on the cost of listing. llowed on interest paid on		
13. Fiji National Provident Fund ("FNPF") Contribution	To provide immediate financial support to employers during t time of financial hardship, the mandatory FNPF contribution or reduced to 5 percent in the COVID-19 Response Budget. Th policy is further extended until 31 December 2021.			
	<ul> <li>Employer contribution exceeding the contribution and up until 10%, will be 150% of the excess.</li> </ul>			
	The deduction will be applied retrosp	pectively from 1 April 2020.		
14. Capital Gains Tax ("CGT")	<ul> <li>CGT exemption threshold for capital gains made by a resident individual or Fijian citizen will be increased from \$16,000 to \$30,000.</li> </ul>			

Policy	Description
15. Income Tax Act – Section 2: Definition of Capital Asset	<ul> <li>Depreciable Assets will now be taxed under Capitals Gains Tax rules and not income tax rules</li> <li>Therefore, the definition of Capital Asset in Section 2 of the Income Tax Act 2015 will be extended to include depreciable assets and section 34 will be amended to clarify rules on disposal of depreciable assets.</li> </ul>
16. Fringe Benefit Tax ("FBT")	A tax deduction will be allowed to the employer for FBT.  Consequently, Section 22 of the Income Tax Act will be amended.
17. Non-Resident Withholding Tax	Section 10 will be amended to exclude accommodation provided or reimbursed, airfare, transport and allowances from the application of Non-Resident Withholding Tax.
18. Permanent Establishment	The Permanent Establishment Rules will be amended to allow consistent application with international taxation rules.
19. Tax deduction on loans taken for medical purposes	<ul> <li>A tax deduction will be allowed on loan (inclusive of both principal amount and interest accrued) taken from a licensed financial institution for medical treatment.</li> <li>The applicant will be required to provide medical certificate, details of the loan facility and receipts to confirm expenses.</li> <li>The following expenses are eligible: <ul> <li>hospital expenses;</li> <li>food and accommodation if part of the package with the hospital;</li> <li>international air fares; and</li> <li>interest expenses incurred with the loan (in case of consolidated loan), interest deduction will be allowed proportionately.</li> </ul> </li> </ul>
20. Corporate Reorganization	<ul> <li>Deferral rules for company incorporation will be introduced.</li> <li>Transfer of assets by an individual shareholder to a company at the point of incorporation will not be subject to tax.</li> <li>Subsequently, disposal of assets will be subject to normal tax.</li> </ul>
21. Donation to the Sports Fund	<ul> <li>The threshold to qualify for the 150% tax deduction available for donations to the Sports Fund will be removed.</li> <li>The recipient of the donation must be registered with the Fiji National Sports Commission.</li> </ul>
22. Tax deduction to hire local artists	A 150% tax deduction will be allowed to hotels and resorts that hire local artists such as craftsmen, dancers and musicians.

### **Tax Administration Act**

Policy	Description
Audit Penalty	<ul> <li>300% VAT evasion penalty and 75% income tax audit penalty will be replaced with a low, harmonized and progressive audit penalty regime.</li> </ul>
	<ul> <li>Audit penalty rates for tax shortfall for Income Tax, VAT and Other Taxes will be 15% per annum and will be computed using the simple interest formula. The same rate and methodology will be applied for tax benefits obtained through overestimation of tax losses.</li> </ul>
	<ul> <li>Consequently, section 46 and Section 46A will be amended and section 46B will be removed.</li> </ul>

### **Stamp Duty Act**

Policy	Description
1. Stamp Duty	Stamp Duty Act will be repealed.

### **Airport Departure Tax Act**

Policy		Description		
1.	Review of Airport Departure Tax	The Airport Departure Tax will be reduced from \$200 to \$100.		

### **Service Turnover Tax Act**

Policy	Description		
Service Turnover Tax ("STT")	The 6% STT on all prescribed services will be removed.		

### Value Added Tax ("VAT") Act

Policy	Description		
VAT Monitoring System ("VMS")	<ul> <li>The implementation of the VMS as captured in the Electronic Fiscal Device ("EFD") Regulations will be further deferred to 01 January 2022.</li> </ul>		
2. VAT Reverse Charge	The provisions of VAT Reverse Charge applicable on supplies received from abroad will be repealed.		
3. VAT on Residential Rents	A person engaged in the supply of residential accommodation, irrespective of the annual gross turnover will be exempted from VAT.		

## **Environment and Climate Adaptation Levy Act**

Ро	licy	Description			
1.	ECAL	<ul> <li>The ECAL will be reduced from 10% to 5%.</li> <li>The threshold for application of ECAL will be increased from \$1.25m to \$3m for all prescribed services.</li> </ul>			
2.	ECAL on Superyacht Charter.	ECAL on Superyacht charter will be reduced from 10% to 5%.			
3.	ECAL on White Goods	ECAL on white goods will be reduced from the current 10% to 5%. The goods are as follows:         Smart phones;         Air conditioners;         Refrigerators and Freezers;         Televisions;         Washing Machines;         Dryers;         Dishwashers;         Electric Stoves;         Microwaves;         Electric Lawn Mowers;         Toasters;         Electric Jugs; and         Hair Dryers.			

Policy Descripti			scription			
4.	Exemption of ECAL on concession codes 232, 284 and 285	•	<ul> <li>The ECAL Act will be amended to include concession code 232, 284, and 285 for exemption of ECAL on vehicles and white goods imported under duty concession.</li> </ul>			
5.	Refund of ECAL in line with the duty drawback provisions of Customs Act	•	<ul> <li>The ECAL Act will be amended to include provisions of refund for ECAL paid on customs declaration in instances of a re-export.</li> </ul>			
6.	ECAL on Motor Vehicles	ECAL on motor vehicles will be reduced from the current 10% to 5%.      ECAL Structure on Hybrid Vehicles				
			Cylinder Capacity Description Current ECAL New ECAL			
			All	New	10%	5%
				Used	10%	5%
			ECAL Structure on N	on-Hybrid Ver	nicles	
		Cylinder Capacity Description Current ECAL I				New ECAL
			All	New	10%	5%
				Used	10%	5%

### **Customs Act**

Policy		Description			
1.	Age limit on passenger motor vehicles	<ul> <li>The age limit requirement on non-hybrid passenger motor vehicles will be removed. Vehicles are still required to be Euro 4 compliant.</li> <li>The age limit requirement for hybrid passenger motor vehicles remains at 5 years.</li> </ul>			
2.	Luxury Vehicle Levy	Luxury vehicle levy imposed on passenger motor vehicles will be removed.			
3.	Objection to Tax Decision	<ul> <li>Customs Act will be amended to allow a taxpayer or importer dissatisfied with a tax decision to lodge an objection with the CEO, FRCS.</li> </ul>			
4.	Trans-shipment Levy (Fish Levy)	The Fish Levy of \$450 per ton will be removed.			
5.	Importation of mobile plant, machinery and cranes	A restriction will be imposed on the importation of mobile plant, machinery and cranes exceeding 32 tonnes as per Section 80 Land Transport Authority Regulations			

### **Local Excise Duty**

Policy	Description		
Decrease in Local Excise Duty on Alcohol	The Local Excise Rate on Alcohol will be reduced by 50%.		

### **New Local Excise Rates for Alcohol**

Description	2019-2020 Rates	2020-2021 Rates
Ale, Beer, Stout and other fermented liquors of an alcoholic strength of 3% or less	\$3.43/litre	\$1.72/litre
Ale, Beer, Stout and other fermented liquors of an alcoholic strength of 3% or more	\$3.99/litre	\$2.00/litre
Potable Spirit Not Exceeding 57.12 GL	\$75.47/litre	\$37.74/litre
Potable Spirit Exceeding 57.12 GL	\$132.17/litre	\$66.09/litre
Still Wine	\$5.32/litre	\$2.66/litre
Sparkling Wine	\$6.07/litre	\$3.04/litre
Other fermented beverages: Still	\$5.32/litre	\$2.66/litre
Other fermented beverages: Sparkling	\$6.07/litre	\$3.04/litre
Ready to Drink Mixtures of any Alcohol and non-alcoholic beverages of an alcoholic strength by volume of 11.49% or less	\$2.45/litre	\$1.23/litre

### **Customs Tariff Act**

Policy		Description				
1.	Reduction in Fiscal Duty on passenger motor vehicles	Import duty on used passenger motor vehicles will be reduced by 75%.  The new import duty structure will be as follows:				
Tariff Structure on Hybrid Vehicles						
		Cylinder Capacity	Description	Current Fiscal Duty	New Duty Rates	
		Less than	New	Free	Free	
		1,500 cc	Used	\$4,000 per unit	\$1,000 per unit	
		1,500 cc to	New	Free	Free	
		2,500 cc	Used	\$5,000 per unit	\$1,250 per unit	
	3,0	2,500 cc to 3,000 cc	New	Free	Free	
			Used	\$6,000 per unit	\$1,500 per unit	
		Exceeding	New	Free	Free	
		3,000 cc	Used	\$13,000 per unit	\$3,250 per unit	

Policy	Description				
	Tariff Structure on Non-Hybrid Vehicles				
	Cylinder Capacity	Description	Current Fiscal Duty	New Duty Rates	
	Less than 1,000 cc	New	15%	5%	
		Used	32% or \$7,000/unit	15% or \$1,750/unit	
		New	15%	5%	
	1,000 cc to 1,500 cc	Used	32% or \$11,500/unit	15% or \$2,875unit	
	1,500 cc to 2,500 cc	New	15%	5%	
		Used	32% or \$16,000/unit	15% or \$4,000/unit	
	2.500 +- 2.000	New	32%	15%	
	2,500 cc to 3,000 cc	Used	32% or \$23,000/unit	15% or \$5,750/unit	
		New	32%	15%	
	Exceeding 3,000 cc	Used	32% or \$28,500/unit	15% or \$7,125/unit	

2. Reduction in Fiscal Duty and Removal of Import Excise on white goods

 To generate demand and business activity, Fiscal Duty on white goods will be reduced while Import Excise will be removed as follows:

	Current Rates			New Rates		
Goods	Fiscal Duty	Import Excise	VAT	Fiscal Duty	Import Excise	VAT
Smart phones	Free	Free	9%	0%	0%	9%
Air conditioners	15%	10%	9%	5%	0%	9%
Refrigerators and Freezers	15%	5%	9%	5%	0%	9%
Televisions	15%	10%	9%	5%	0%	9%
Washing Machines	15%	10%	9%	5%	0%	9%
Dryers	15%	10%	9%	5%	0%	9%
Dishwashers	15%	10%	9%	5%	0%	9%
Electric Stoves	15%	10%	9%	5%	0%	9%
Microwaves	15%	10%	9%	5%	0%	9%
Electric Lawn Mowers	5%	Free	9%	5%	0%	9%
Toasters	15%	10%	9%	5%	0%	9%
Electric Jugs	15%	Free	9%	5%	0%	9%
Hair Dryers	15%	10%	9%	5%	0%	9%

Policy		Description		
3.	Concession for importation by Private Individual	<ul> <li>Concession for importation by a private individual will be extended to importation by sea freight in addition to the current air freight.</li> <li>The concession is further extended by increasing the maximum threshold of goods imported from \$400 to \$2,000.</li> </ul>		
4.	Concession code 241 – concession for bus operators	<ul> <li>Concession code 241 will be extended to include tickets rolls in addition to new chassis, engines, identifiable fixtures and components, ticketing machines and ticketing machine parts.</li> <li>Additionally, the fiscal duty on identifiable fixtures and components will be reduced from 5% to zero.</li> </ul>		
5.	Concession code 223B – concession university, school and other educational institution	Concession code 223B will be introduced to allow the importation of educational materials imported by Fiji Airways Aviation Academy (FJAA) for training purposes at Free Fiscal, Free Import Excise and 9% VAT.		
6.	Concession code 231	Concession code 231 will be extended to include the importation of innovative packaging materials at the rate of Free Fiscal, Free Import Excise and 9% VAT.		
7.	Concession code 257	Concession code 257 will be expanded to include the importation of hydroponic and greenhouse goods at the rate of Free Fiscal and Free Import Excise and 9% VAT.		

## **Customs Tariff Act: Import Duty Rate Changes**

Please refer to the separate attachment for details of the import duty rate changes.

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This Fiji National Budget Synopsis has been prepared to provide a prompt overview of the general issues raised in the 2020-2021 Fiji National Budget. It does not exhaustively cover the subjects discussed. When specific issues occur in practice it may be necessary to refer to the laws and regulations and to obtain appropriate professional advice.

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