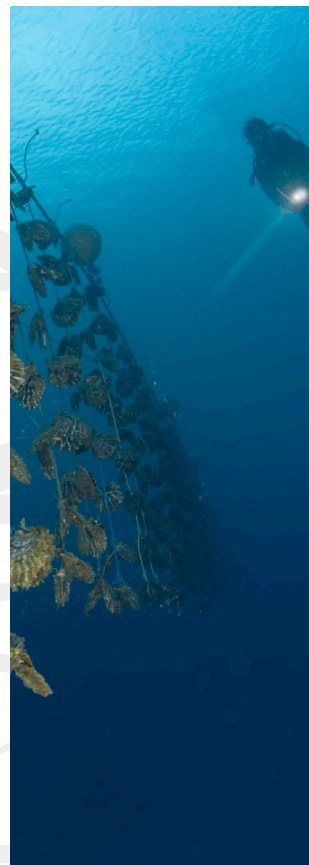
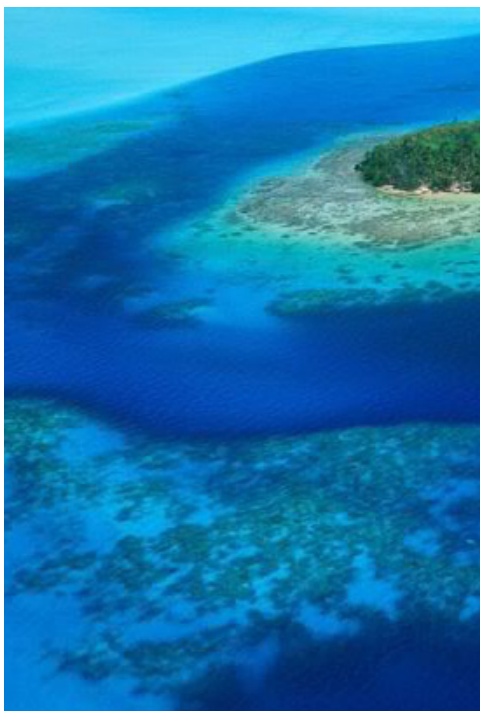
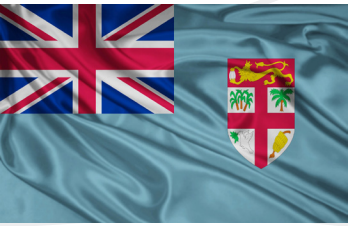
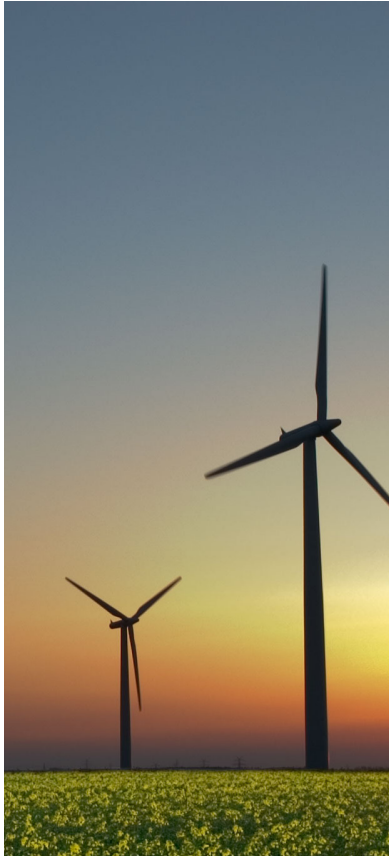


2014 FIJI TAX AND CUSTOMS INCENTIVES



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2001-2014 Investment Package

CORPORATE TAX RATE REDUCTION

YEAR	RESIDENT COMPANIES	NON-RESIDENT COMPANIES
2001	From 35% to 34%	From 45% to 34%
2002	From 34% to 32%	From 34% to 32%
2003	No change – 32%	No change – 32%
2004	From 32% to 31%	From 32% to 31%
2005 – 2008	No Change – 31%	No Change – 31%
2009	From 31% to 29%	From 31% to 29%
2010	From 29% to 28%	From 29% to 28%
2011	28%	28%
2012	From 28% to 20%	From 28% to 20%
2013	20%	20%
2014	20%	20%

- A foreign company that establishes/relocates its Headquarters to Fiji will be subject to a low corporate tax rate of 17%.
- A listed company on the South Pacific Stock Exchange (SPSE) will be subject to a low corporate tax rate of 10%.
- Income earned from trading of shares in SPSE will be exempted from Income Tax and Capital Gains Tax.

RESIDENT TAXPAYERS: 2014 PAYE AND SRT STRUCTURE

Chargeable Income (\$)	PAYE Tax Payable (\$)	Social Responsibility Tax (SRT) Payable
0-16,000	Nil	
16,001 – 22,000	7% of excess over \$16,000	
22,001– 50,000	420 +18% of excess over \$22,000	
50,001 – 270,000	5,460 +20% of excess over \$50,000	
270,001 - 300,000	49,460 + 20% of excess over \$270,000	23% of excess over \$270,000
300,001 - 350,000	55,460 +20% of excess over \$300,000	6,900 + 24% of excess over \$300,000
350,001 - 400,000	65,460 + 20% of excess over \$350,000	18,900 + 25% of excess over \$350,000
400,001 - 450,000	75,460 + 20% of excess over \$400,000	31,400 + 26% of excess over \$400,000
450,001 – 500,000	85,460 + 20% of excess over \$450,000	44,400 + 27% of excess over \$450,000
500,001 – 1,000,000	95,460 + 20% of excess over \$500,000	57,900 + 28% of excess over \$500,000
1,000,001 +	195,460 + 20% of excess over \$1,000,000	197,900 + 29% of excess over \$1,000,000

NON-RESIDENT TAXPAYERS: 2014 PAYE AND SRT STRUCTURE

Chargeable Income (\$)	PAYE Tax Payable (\$)	Social Responsibility Tax (SRT) Payable
0-16,000	20% of excess of \$0	
16,001 – 22,000	3,200 + 20% of excess over 16,000	
22,001– 50,000	4,400 + 20% of excess over \$22,000	
50,001 – 270,000	10,000 + 20% of excess over \$50,000	
270,001 – 300,000	54,000 +20% of excess over \$270,000	23% of excess over \$270,000
300,001 – 350,000	60,000 + 20% of excess over \$300,000	6,900 + 24% of excess over \$300,000
350,001 – 400,000	70,000 + 20% of excess over \$350,000	18,900 + 25% of excess over \$350,000
400,001 – 450,000	80,000 + 20% of excess over \$400,000	31,400 + 26% of excess over \$400,000
450,001 – 500,000	90,000 + 20% of excess over \$450,000	44,400 + 27% of excess over \$450,000
500,001 – 1,000,000	100,000 + 20% of excess over \$500,000	57,900 + 28% of excess over \$500,000
1,000,001 +	200,000 + 20% of excess over \$1,000,000	197,900 + 29% of excess over \$1,000,000

2001-2014 Investment Package

INVESTMENT ALLOWANCE

- Investment allowance (excluding cost of labor) of 40% for extension and renovation expenses with a minimum qualifying capital expenditure of \$50,000. This is only available to existing businesses in Vanua Levu.

LOSS CARRIED FORWARD

- Loss carried forward can be claimed up to 4 years. Loss carried forward by a company is allowed if that entity satisfies the continuity of ownership test or the same business test.

ACCELERATED DEPRECIATION

- Accelerated depreciation for building erected before 2001 has been extended to 2014. 20% depreciation for building used for agricultural, commercial or industrial purpose can be written off within any 5 of 8 years.
- 100% write off will be available in the year the expenditure was incurred on water storage facilities and renewable energy plant and machineries.
- This will also be available to new plants and machineries used for manufacturing purposes.

DUTY CONCESSIONS

PRODUCTION INPUTS

- All goods used as raw materials in the manufacture of approved goods not available locally will attract 3% fiscal duty + 15% VAT, and all raw material used for manufacturing by companies outside of Viti Levu will attract 0% fiscal duty + 15% VAT.

CAPITAL ITEMS

- Duty rates on capital items (which refer to machinery used for converting / processing raw materials) will attract 0% fiscal duty + 15% VAT.

EXPORT INCOME DEDUCTION

- "Export income" means net profits derived by a taxpayer from the business of exporting goods and services but excludes re-exports. Deduction shown below.

Year of assessment	Percentage of export income to be deducted
2011	50%
2012	40%
2013	40%
2014	40%

- Export income deduction will only be allowed if the Commissioner of Inland Revenue is satisfied that the export earnings will be remitted to Fiji.

DUTY SUSPENSION SCHEME

- Enables exporters to have access to inputs without having to pay for duties upfront.
- Imported goods are conditionally relieved from payment of fiscal duty and VAT on the basis that such goods will be substantially transformed through manufacturing or processing and subsequent exportation.
- The Scheme would entitle exporters to import duty free an amount equal to the proportion of approved imported inputs required to produce exports. This is called entitled Proportion (EP).
- Administered by the Fiji Export Council, which is a private sector led organization.
- Zero fiscal duty on New Machinery and Equipment that are directly related to the production process.



Hotel Industry Incentives



STANDARD ALLOWANCE

- Investment allowance (in addition to ordinary depreciation) of 55% of total capital expenditure is allowed as a deduction provided there is no shift of tax revenue to other countries.
- Applicable to building of new hotel including renovations

or refurbishments or extensions of existing hotel and International Retiree Facilities.

- Investment Allowance can only be written-off against the income of the hotel business or income from the hotel premises.

Hotel Industry Incentives

STANDARD ALLOWANCE (CONT'D)

- Losses carried forward extended to 8 years.
- Recipients of the provisional approval for Standard Allowance to commence implementation of project within one year.
- Investors would only need to provide a sketch plan to obtain provisional approval for the investment allowance, and not necessarily a certified approved.

NEW SHORT LIFE INVESTMENT PACKAGE

- 10 year tax holiday for capital investments not less than \$7 million.
- Import duty exemption on all capital goods (including capital equipment, plant & machinery) not available in Fiji but this does not include furniture or motor vehicles that are used in carrying out the investment.
- Short Life Investment Package (SLIP) Incentives is also available for retirement facilities and hospital resorts.
- Recipients of the provisional approval for Standard Allowance to commence implementation of project within one year.
- Investors would only need to provide a sketch plan to obtain provisional approval for the investment allowance, and not necessarily a certified approved.

BACKPACKER OPERATIONS

- Income tax exemptions for locally owned backpacker operators with annual sales turnover of \$1m or less.
- Duty exemption on the importation of raw materials and equipment used for the establishment of a backpacker hotel. (This incentive will only be available to backpacker businesses who are granted the income tax holiday).



Audio Visual Incentives

INCOME TAX DEDUCTIONS

- 150% deduction for capital expenditure on an F1 audio-visual production.
- 125% deduction for capital expenditure on an F2 audio-visual production.

Levels of Expenditure in Fiji for an audio-visual production for F1 and F2 status should not be less than:

- 40% for a large format film, a feature film or broadcast television programmes;
- 50% for a direct to video programme or video disk programme; and
- 55% for an audio recording.

INCOME TAX EXEMPTION

- Net income from an F1 production is exempt until taxpayer has received a 60% return on capital expended. Thereafter, net income will be fully taxed at the marginal rate.
- Net income from an F2 production is exempt until taxpayer has received a 50% return on capital expended. Thereafter, net income will be fully taxed at the marginal rate.

Audio Visual Incentives

STUDIO CITY ZONE CONCESSIONS

- Any sole proprietor, partnership or company that carries on a production activity (the production of, distribution of or supply of services to audio-visual productions) may qualify for an operating licence in the Studio City Zone and be entitled to an exemption from tax on the income from the production activity carried on in the Zone.
- Tax free status for “permanent residents” of the Studio City Zone on income derived as earnings from audio-visual productions.

For residence in the Zone to be approved, in the case of citizens, the individual must be:

- resident in the Zone for at least 183 days;
- have pre-tax audio visual earnings in excess of \$100,000;

- have fixed assets in the Zone in excess of \$250,000; and
- maintain a primary place of residence in the Studio City Zone.

For residence in the Zone to be approved, in the case of non-citizens (or a citizen who derives a minimum of 80% of audio visual earnings from outside Fiji), the individual must be: -

- resident in the Zone for at least 60 days;
- have pre-tax audio visual earnings in excess of \$100,000;
- have fixed assets in the Zone in excess of \$250,000; and
- maintain a permanent place of residence in the Studio City Zone.

FILM TAX REBATE

Summary Part IV, 6th Schedule – Income Tax Act

	Fiji Film Tax Rebate Bill
Rebate Amount	47% tax rebate or credit on production costs spent in Fiji: paragraph 68(1)
Eligibility	Films and television productions, as per existing Sixth Schedule: paragraph 69
Minimum Spend in country	Minimum spend in Fiji F\$250,000 for feature films and broadcast television; and \$50,000 for production intended as an advertising program or commercial in at least one significant international market : paragraph 69(e)
Maximum Rebate	F\$11.75 million, so even if more than \$25 million spent in Fiji the maximum rebate is still F\$11.75 million: paragraph 68(2).
Exclusions	Where a producer has chosen to access the film tax rebate, the producer will not be able to obtain any other tax concessions under Parts 3 of Sixth Schedule: paragraph 67(2).

Additional Incentives (Allowable Expenditures):

- Allowable expenditure incurred for services rendered by the producers (producer’s fees) – provided that such expenditure shall not exceed 10% of the total Fiji Expenditure. Producers are not restricted to remain in Fiji throughout the production of the film.
- 75% of the expenditure incurred to purchase costumes, make-up and set design properties not available in Fiji that will be used in relation to the film production in Fiji provided that any such costumes, make-up and set design properties shall be left in Fiji at the end of the production.

- Expenditure incurred to purchase the writer’s story and rights for the production of the film provided that the producer submits the following documentary evidence:
 - Notarized legal contract with the writer which is registered in Fiji with the Registrar of Deeds upon payment of the appropriate stamp duty;
 - Evidence of payment made directly into the writer’s bank account from the Fiji bank account; and
 - Receipt of acknowledgement of payment received.
- Approved post-production expenditure on the film paid from a Fiji bank account to the extent that it is incurred or reasonably attributable to approved post-production services in relation to the completing of the film made in Fiji. The maximum payable in rebate shall be granted upon the production of documentary evidence of the expenditure. Rebate is around 2%-2.5% of production budget.
- Expenditures incurred on hiring of cameras and filming equipment from outside Fiji, where such cameras and filming equipment are not available in Fiji.

Additional Requirements:

- Companies should engage Audio Visual Agents
- Fiji as a location needs to be accredited and acknowledged in the film’s credits and other accreditation as stipulated by Film Fiji in their approval letter.



Agriculture Incentives

COMMERCIAL AGRICULTURE AND AGRO-PROCESSING

- The Importation of all agricultural items will be subject to zero Duty.

NEW BUSINESSES FROM 2009 ONWARDS

- The income of any new activity in commercial agricultural farming and agro-processing approved and established from 1 January 2010 to 31 December 2014 shall be exempt from tax for 10 consecutive fiscal years with a capital investment of \$2,000,000 or more.

BIO – FUEL PRODUCTION

- 10 year tax holiday is available to a taxpayer undertaking a new activity in processing agricultural commodities into bio-fuels as approved by the Commissioner from 1 January 2009 to 31 December 2014. To qualify, the taxpayer must have:-
 - Minimum level of investment of \$1,000,000; and
 - Employ 20 local employees or more for every income year.
- Duty free importation of plant, machinery and equipment for initial establishment of the factory.
- Duty free importation of chemical required for bio-fuel production.



Small And Micro Enterprises



SMALL AND MICRO ENTERPRISES

Income tax exemption to be applicable to selected sectors with maximum turnover threshold of \$500,000. The sectors include:

- Agriculture and Fishing (Sugarcane Farmers; Coconuts; Rice; Ginger; Yaqona; Fishing; Raising Livestock; Vegetable; dalo, cassava and other root crops production; farming and Bee keeping).
- Tourism (Sea Cruise and River tour Operators).
- Community and Social Services (Amusement, recreation services; traditional handicraft producers (not “middleman” or agents)).
- Supportive projects to tourism industry (flora, fauna and other natural characteristics of Fiji; and history, traditions, cultures and ways of life of its peoples).



Tax Free Region (TFR) Incentives

TFR INCENTIVES

Who will qualify for this incentive?

This incentive is available to a newly incorporated entity engaged in a new trade, business or manufacture established in the following areas:-

- Vanua Levu – included Taveuni, Rabi, Kioa and other islands generally included for government's administrative purpose as being in the Northern Division.
- Rotuma
- Kadavu
- Levuka
- Lomaiviti
- Lau; and
- East of Viti Levu (Korovou-Tavua region)
- Any company may apply to the Minister for Finance in a prescribed form (Form 6) for an operating license.

Criteria for Grant of License

- The company is a newly incorporated entity engaged in a new trade, business or manufacture.
- The minimum initial level of investment should be \$250,000 from 1 January 2010.

Tax Exemptions Available

- (i) The income of any new activity approved and established between 1 January 2010 to 31 December 2018 shall be exempt from tax as follows:
- capital investment from \$250,000 to \$1,000,000, for a period 5 consecutive fiscal years; or
 - capital investment from \$1,000,000 to \$2,000,000, for a period of 7 consecutive fiscal years; or
 - capital investment above \$2,000,000 for a period of 13 consecutive fiscal years.

Duty Exemption

Import duty exemption on the importation of raw materials, machinery and equipment (including parts and materials) insofar as they are required for the establishment of the business in the Tax Free Region.

Other benefits under the TFR

- Additional 5 years of income tax exemption is available to any company granted a license and having indigenous Fijian landowner equity of at least 25 percent.
- Additional 7 years of income tax exemption is available to any hotel developer granted a license and having indigenous Fijian landowner equity of at least 25 percent.



Information Communication Technology (ICT) Incentives

ICT INCENTIVES

The income of any new operator who is granted a license from 1 January 2009 to be exempt from tax for a period of 13 years

- Any new operator may apply and pay a license fee of \$1,000 per annum to the Commissioner of Inland Revenue. The Tax exemption is granted from the date of the initial license.
- Income tax exemption is available to investors under the following criteria:-

- Business employs 50 employees or more for any 6 months within the income year; and
- 60 percent of its total services is exported.
- Duty free importation of computer, computer parts & accessories, plant, equipment & fittings, and specialised furniture for initial establishment and during its ongoing operations to approved ICT/BOP Business operators from 1 January 2009.



Manufacturers Incentives



FOOD PROCESSING & FORESTRY

- 100% of the amount of investment as a deduction for investing in food processing as well as forestry. Re-investment will also be allowed for expansion purposes. In order to qualify, the investor should utilize 50% of local produce in its production process.

RENEWABLE ENERGY PROJECTS AND POWER CO-GENERATION

- 5 year tax holiday is available to a taxpayer undertaking a new activity in renewable energy projects and power cogeneration as approved by the Commissioner.
- Duty free importation of renewable energy goods is also available.



Other Incentives



SHIPPING COMPANIES

Maritime Shipping

- 100% of the amount of investment as a deduction for investing in food processing as well as forestry. Re-investment will also be allowed for expansion purposes. In order to qualify, the investor should utilize 50% of local produce in its production process.

UNIT TRUST COMPANIES

Withholding Tax and Capital Gains Tax Waiver

- Withholding taxes and capital gains taxes on interest income distribution to investors of the Unit Trusts will be waived.

FIJI MY SECOND HOME PROGRAMME

- This Programme is open to citizens of other countries recognized by Fiji in the "Fiji My Second Home Programme" as administered by the Reserve Bank of Fiji.
- Interest income is exempt from tax under the following criteria:-
 - o Age below 50 years old:
 - Minimum deposit of \$150,000 and maintain the deposit in Fiji for a minimum of two years.
 - o Age 50 years and above::
 - Minimum deposit of \$100,000 and maintain the deposit in Fiji for a minimum of two years.
- To qualify the applicant must maintain a minimum balance of \$50,000 from the third year onwards and throughout the entire stay in Fiji.

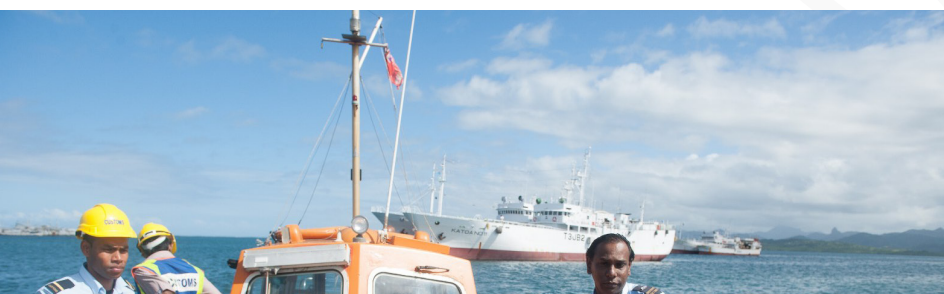
FOREIGN CURRENCY ACCOUNT SCHEME

- Interest income is exempt from tax which accrues to or in favor of a non-resident including former Fiji residents who hold funds in Fiji commercial bank accounts under the following criteria:-
 - For foreign currency accounts, interest income for deposit above the equivalent of FJD\$150,000;
 - For Fiji Dollar accounts, any amount of interest income.

Other Incentives

OTHER INCENTIVES

- **Employment Taxation Scheme** – 150% of the salary and wages paid by an employer within 1 January 1997 and 31 December 2018 are tax deductible. The deduction is restricted to salary and wages paid in respect of 12-month period commencing from the date of the appointment of the employee provided he or she has not previously been in full-time paid employment. This is extended to trainees and apprentices.
- **Donation of new Computers, Laptops & Tablets** - 150% and 200% tax deductions for donation of computers to schools registered with the Ministry of Education, will be available with the following features:
 - 200% tax deduction relates to donation to schools in rural areas.
 - 150% tax deduction relates to donation to schools in urban areas
 - Donations to be between \$10,000 to \$100,000.
- **Voluntary Contribution for Disaster Relief** - 150% tax deduction for voluntary contribution of cash donation by businesses towards a Disaster Relief Fund. The threshold will range from a minimum contribution of \$10,000 to a maximum contribution of \$100,000.
- **Sports Sponsorship** - 150% tax deduction for sports sponsorship with a minimum cash sponsorship of \$50,000.
- **Sponsorship of hiring of international Coaches** – 150% tax deduction for sponsorship between \$100,000 and \$200,000 towards the hiring of international sporting coaches.
- **Cash Contribution towards Housing Projects** - 150% tax deduction for cash contributions up to \$50,000 towards any Government sanctioned housing project for squatters and informal settlements.
- **Incentives for Senior Citizens** - All Senior citizens (over 55 years) and Pensioners will be exempted from paying resident interest withholding tax on interest income of up to \$16,000 from bank deposits, provided this is their only source of income.



OTHER CUSTOMS CONCESSIONS

Newly introduced concessions

Items	Descriptions	Fiscal Duty	VAT (%)
Food Supplements	Reduce fiscal duty on food supplements from 32% to 0% Food supplements include essential vitamins and fortifications which are predominantly used by pregnant mothers, senior citizens and chronically ill patients.	0%	15%
Baby feeding bottles	Reduce fiscal duty on baby feeding bottles from 32% to 0%. To reduce importation of cheap low quality baby bottles which may cause health risks.	0%	15%
Shipping Incentives	Duty on the importation of all spare parts for maritime vessels is reduced to 0%.	0%	15%
Promote domestic Fishing industry	Exemption of Bunker fee of 2 cents/litre for local fishing vessels; Duty concession on specialized fishing item/equipment which are currently not covered under the existing concession for the fishing industry.	-	-

Other Customs Concessions

NEWLY INTRODUCED CONCESSIONS (cont'd)

Items	Descriptions	Fiscal Duty	VAT (%)
Agriculture	Duty on the importation of all agricultural items will be reduced to 0%.	0%	15%
Adult sanitary diapers	Duty on the Importation of all sanitary diapers will be reduced to 0%	0%	15%
Pre-fabricated homes (kit homes)	Duty on prefabricated homes will be reduced from 32% to 3% and duty on prefabricated concrete products and iron panels for commercial use will be reduced from 32% to 5%.	Prefab homes (3%) Prefab concrete & Iron panels (5%)	15%
Duty concession for returning residents	Duty concession under code 220 (Free Fiscal, Free import excise, Free VAT) on importation of house hold effects and vehicles by returning residents. This concession is subject to certain conditions under Code 220.	0%	Free

OTHER EXISTING CONCESSIONS

Industry	Items	Fiscal Duty	V A T (%)
Agriculture & Dairy	Specialised agriculture, livestock and dairy machineries, equipment and agricultural inputs excluding those that attract duty rates of free Fiscal and free Import Excise in the Tariff. The importation under concession is subject to the condition that a letter of approval is issued by the Ministry of Agriculture in relation to goods under concession.	Free	15%
B u s Operators	Bus operators holding Road Service Licence operating under schedule trips approved by Land Transport Authority. Refund of duty on gas oil (diesel) having sulphur content not exceeding 500ppm purchased ex-duty paid stock.	2 cents per litre refund	
Fisheries & Forestry	Specialised machineries directly used for fisheries and forestry purposes. The importation under concession is subject to the condition that a letter of approval is issued by Department of Fisheries & Department of Forests in relation to goods under concession.	Free	15%
M a r i t i m e S a f e t y Authority of Fiji (MSAF)	Life jackets procured from local manufacturers operating under TFF or DSS. The imported raw materials incorporated in the manufacture of life jackets.	Free	15%
S p o r t s Supplement	Protein shakes and sporting tablets/capsules that will enhance athletic performance by supplying nutrients to the body which are lost in the process of strenuous training and fitness programs. This concession does not extend to the products Powerade, Gatorade, Red Bull, V-Drink and Mother, etc.	Free	15%

DISCLAIMER

These incentives are available as at 1st January 2014. For their availability and application, please contact FRCA Policy and Research Unit:

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