

For attention: Mr M Kingon  
South African Revenue Service

19 October 2022

Dear Sir,

## REQUEST TO EXTEND THE DEADLINES FOR SUBMITTING ITR 12 RETURNS

### INTRODUCTION

1. SARS announced the 2022 tax season commencing on 1 July 2022 and run until 24 October 2022 for non-provisional taxpayers. This left tax practitioners and taxpayers with a shorter season than previous years. The deadlines set initially seemed reasonable and achievable given that the auto-assessments process was designed with the intent to help the timely submissions for selected taxpayers. However, auto assessments did not seem to have achieved intended results this year, creating more queries which had to be answered by SARS.
2. The 2022 tax season was immediately halted by the SARS industrial strike action which ended only during August. During this time communication with SARS was limited resulting in tax practitioners spending additional time on resolving queries. The SAIBA survey on The Impact of SARS Industrial Action on Tax Practitioners paints a gruelling picture of backlogs and extra work that is required by tax practitioners to make deadlines. You can refer to the article based on the survey attached to this mail.
3. Maintenance and breakdowns of generation units have resulted in over 100 days of load shedding in South Africa in 2022. From the beginning of September Eskom introduced load shedding up to 6 hours a day with severe consequences for small accounting firms without generator backups. SAIBA members are mostly small and medium sized firms that found themselves in a challenging situation to manage work.
4. In our recent survey 76% of respondents voted in favour of SARS providing a 21-day leniency / extension for the ITR12, with further 10% stating they would be happy with considerations for special cases only.

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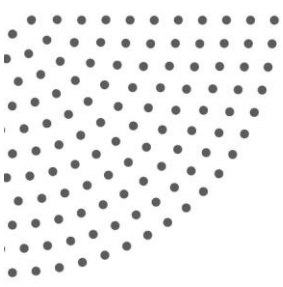
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## OUR REQUEST

5. On behalf of our members SAIBA would like to submit a formal request to the South African Revenue Service to **extend the ITR 12 submission deadlines with an additional 21 days**. The additional time would allow a buffer for tax practitioners to compensate for various difficulties encountered during the filing season, as described above.
6. We believe that extending the deadlines at this late hour would be beneficial both to tax practitioners and SARS. While SARS manages its own backlogs this would assist to reduce the number of cases which end up non-complying, with less objections raised and unnecessary follow-up work. Although we understand that giving extensions may create the incorrect habitual thinking, we believe that in this case it is justified. Furthermore, the gesture will create a sense of goodwill towards SARS from tax practitioners and taxpayers.
7. While we appreciate the work of SARS to maintain order and compliance regarding revenue collection, we hope that our recommendations will find your attention. Please do not hesitate to contact us for further information or detail.

Your Sincerely,

Eszter Rapanos  
SAIBA Technical Manager