FIJI REVENUE & CUSTOMS AUTHORITY

2013 INCENTIVES BROCHURE
FIJI TAX AND CUSTOMS INCENTIVES

2001-2013 INVESTMENT PACKAGE

HOTEL INDUSTRY

AUDIO VISUAL

AGRICULTURE

TAX FREE REGION

ICT

MANUFACTURERS

FIJI MY SECOND HOME

FOREIGN CURRENCY ACCOUNT SCHEME

OTHER INCENTIVES

CUSTOMS CONCESSIONS
Introduction

The Fiji Revenue and Customs Authority (FRCA) reached its tenth year anniversary in 2008. Its establishment was a result of Government’s decision to strengthen and consolidate synergies for the collection of revenues by the former two major Government Departments – The Fiji Inland Revenue Service (IRS) and the Fiji Islands Customs Service. Tax and Duty incentives form part of Fiji’s investment promotion strategy and FRCA is the official Government agency responsible for the administration of these incentives. The incentives come in a variety of forms such as tax exemption, tax deduction, investment allowance, rebate, duty reduction and duty exemption.

CUSTOMS

The Customs Division is responsible for collection of revenue for FRCA in the customs area, acts as a principal agency for border control and the facilitation of trade.

TAXATION

The Taxation Division is one of the operational arms of the authority that looks after all tax administration of the authority in its role of collecting tax revenue for the government.

Investment Facilitation

This role is performed in FRCA by the Policy Section.

CORPORATE SERVICES

The Corporate Services Division offers support functions to the Customs and Taxation Divisions of the Authority. The Division comprises seven sections.

2012 Revenue PERFORMANCE

The Fiji Revenue & Customs Authority (FRCA) recorded another solid performance with outstanding tax collection for the year 2012. The collection was above the 2011 total tax revenue collection by $149m, showing a growth of 9.4% over the 2011 tax revenue collection.

The total revenue collection for 2012 stood at 24% of total GDP, with the VAT revenue collection recording 9.4% of GDP, Income Tax revenue recording 6.2% of total GDP, and Customs revenue recording a collection of 5.1% of GDP. The other revenue types recorded a collection of 3.3% of GDP. This is far higher than the 21.7% against GDP recorded in 2011. The total tax revenue is 89% of total government revenue for 2012. The record collection is a result of FRCA’s continuous efforts in ensuring that proper taxes are being collected, new revenue policies implemented in 2012, and the commitment by taxpayers in meeting their tax obligations on time.

The revenue target for 2013 poses a challenge for the authority with a forecast of $1.852b. Continuous emphasis will be placed on compliance, publicity and public awareness to ensure effective revenue collection in 2013.

Source: FRCA

while the performance of most of Fiji’s major trading partner economies remained weak, there are signs of stabilisation towards the end of the year, particularly for the US and Chinese economies. Downside risks to Fiji’s growth projections have now increased as a result of Tropical Cyclone Evan. Damages to infrastructure, cane and non-cane crops, livestock and the loss of manufacturing and retailing hours are expected to provide downward impetus on the growth outlook. Investment indicators remained upbeat.

Source: Reserve Bank of Fiji Economic Review Dec 2012

VAT continued to be the dominant source of the overall tax revenue by accounting for about 39%. Income Tax and Customs accounted for 25.8% and 21.2% respectively. When compared to the last three years, it is observed that the proportion of VAT revenue to total tax revenue is increasing whilst the opposite trend is noticed for Income Tax and Customs mainly due to reduction in tax rate and increased concessions.
1. 2001 - 2013 Investment Package

A) TAX RATE REDUCTION

- Corporate tax rate lowered from 28 percent to 20 percent.
- Companies by law will pay 90 percent of their advance payment within the fiscal year.
- Should free up money for businesses to invest in new opportunities, new infrastructure, and to reward increased productivity.
- The Gold Card Scheme provides benefits for those companies that have a good track record for tax compliance. These benefits will include individualized services.
- Tax rate changes are shown in Table 1.

Table 1: Tax Rate Changes

<table>
<thead>
<tr>
<th>YEAR</th>
<th>RESIDENT COMPANIES</th>
<th>NON-RESIDENT COMPANIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001</td>
<td>From 35% to 34%</td>
<td>From 45% to 34%</td>
</tr>
<tr>
<td>2002</td>
<td>From 34% to 32%</td>
<td>From 34% to 32%</td>
</tr>
<tr>
<td>2003</td>
<td>No change - 32%</td>
<td>No change – 32%</td>
</tr>
<tr>
<td>2004</td>
<td>From 32% to 31%</td>
<td>From 32% to 31%</td>
</tr>
<tr>
<td>2005 - 2008</td>
<td>No Change – 31%</td>
<td>From 31% to 29%</td>
</tr>
<tr>
<td>2009</td>
<td>From 31% to 29%</td>
<td>From 31% to 29%</td>
</tr>
<tr>
<td>2010</td>
<td>From 29% to 28%</td>
<td>From 29% to 28%</td>
</tr>
<tr>
<td>2011</td>
<td>28%</td>
<td>28%</td>
</tr>
<tr>
<td>2012</td>
<td>From 28% to 20%</td>
<td>From 28% to 20%</td>
</tr>
<tr>
<td>2013</td>
<td>20%</td>
<td>20%</td>
</tr>
</tbody>
</table>

- 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 18.5% provided the company has 40 percent local shareholding structure.

Table 2: Resident Taxpayers: 2013 PAYE And Social Responsibility Tax Structure

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

Table 3: Non-Resident Taxpayers: 2013 PAYE And Social Responsibility Tax Structure

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

B) 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.
C) 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.

D) 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 in Table 4.

<table>
<thead>
<tr>
<th>Year of assessment</th>
<th>Percentage of export income to be deducted</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>50%</td>
</tr>
<tr>
<td>2012</td>
<td>40%</td>
</tr>
<tr>
<td>2013</td>
<td>40%</td>
</tr>
</tbody>
</table>

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

E) 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.

F) 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 located outside of Viti Levu will attract 0% fiscal duty + 15% VAT.

CAPITAL ITEMS

- Duty rates on capital items (which refer to machinery used in the manufacture of approved goods) will attract 0% fiscal duty + 15% VAT.

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.

2. HOTEL INDUSTRY INCENTIVES

A) 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.
- Losses carried forward can be claimed for up 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.

B) 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.
3. AUDIO VISUAL INCENTIVES

A) 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.

B) 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.

C) STUDIO CITY 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 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.

D) FILM TAX REBATE

Table 5: Film Tax Rebates. Summary Part IV, 6th Schedule – Income Tax Act

<table>
<thead>
<tr>
<th>Fiji Film Tax Rebate Bill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rebate Amount</td>
</tr>
<tr>
<td>47% tax rebate on production costs spent in Fiji: paragraph 68(1)</td>
</tr>
<tr>
<td>Eligibility</td>
</tr>
<tr>
<td>Films and television productions, as per existing Sixth Schedule: paragraph 69</td>
</tr>
<tr>
<td>Minimum Spend in country</td>
</tr>
<tr>
<td>Minimum spend in Fiji F$250,000 for feature films and broadcast television; and F$50,000 for production intended as an advertising program or commercial in at least one significant international market : paragraph 69(e)</td>
</tr>
<tr>
<td>Maximum Rebate</td>
</tr>
<tr>
<td>F$11.75 million, so even if more than F$25 million spent in Fiji the maximum rebate is still F$11.75 million: paragraph 68(2);</td>
</tr>
<tr>
<td>Exclusions</td>
</tr>
<tr>
<td>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).</td>
</tr>
</tbody>
</table>

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 completion 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.
4. AGRICULTURE INCENTIVES

A) Commercial Agriculture and Agro-Processing

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.

B) SMALL AND MICRO ENTERPRISES (SME’S)

Income tax exemption to be applicable to selected sectors with maximum turnover threshold of $300,000. 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).

5. TAX FREE REGION INCENTIVES

NORTHERN DIVISION

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; and Lau
- Any company may apply to the Minister for Finance in a prescribed form for an operating license. Incentive is available to a newly incorporated

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

1. The income of any new activity approved and established between 1 January 2010 to 31 December 2014 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.

2. The income of any new activity approved and established from 1st January 2015 shall be exempt from tax for a period of 13 consecutive fiscal years with an initial capital investment of $2,000,000 or more.

Duty Exemption

- Import duty exemption on the importation of raw materials, machinery and equipment (including parts and materials) for the establishment of the business for 12 months from the date of approval. The duty exemption will cease upon 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 i-Taukei 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.

EASTERN VITI LEVU (KOROVOU TO TAVUA)

Who will qualify for this incentive?

- This incentive is available to a newly incorporated entity engaged in the agriculture and dairy sectors established in the following areas:
  - Korovou, Rakiraki, Tavua
- The newly incorporated entity may apply to the Minister for Finance in a prescribed form for an operating license.

Criteria for Grant of License

- The company is a newly incorporated entity engaged in the agricultural and dairy sector;
- The minimum initial level of investment should be $1m from 1 January 2013.

Tax Exemptions Available

1. The income of any new activity engaged in the agricultural sector shall be exempt from tax for 13 years:
2. The income derived from any new activity engaged in the dairy industry shall be exempt from tax for 20 years.

Duty Exemption

- Import duty exemption on the importation of raw materials, machinery and equipment (including parts and materials) for the establishment of the business for 12 months from the date of approval.
6. INFORMATION COMMUNICATION TECHNOLOGY (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
  • 50 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.

7. 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 Cogeneration

• 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.

8. 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 (www.reservebank.gov.fj)

• Interest income is exempt from tax under the following criteria:-
  • Age below 50 years old:
    • Minimum deposit of $150,000 and maintain the deposit in Fiji for a minimum of two years.
  • 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.

9. 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.

10. OTHER INCENTIVES

• Employment Taxation Scheme – 150% of the salary and wages paid within 1 January 1997 and 31 December 2014 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.

• 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; and
  • Donations to be between $10,000 to $100,000.
11. OTHER CUSTOMS CONCESSIONS

Table 6: Other Customs Concessions

<table>
<thead>
<tr>
<th>Industry</th>
<th>Items</th>
<th>Fiscal</th>
<th>VAT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture &amp; Dairy</td>
<td>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.</td>
<td>Free</td>
<td>15%</td>
</tr>
<tr>
<td>Bus Operators</td>
<td>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.</td>
<td>2 cents per litre refund</td>
<td>-</td>
</tr>
<tr>
<td>Fisheries &amp; Forestry</td>
<td>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 &amp; Department of Forests in relation to goods under concession.</td>
<td>Free</td>
<td>15%</td>
</tr>
<tr>
<td>Maritime Safety Authority of Fiji (MSAF)</td>
<td>Life jackets procured from local manufacturers operating under TFF or DSS. The imported raw materials incorporated in the manufacture of life jackets.</td>
<td>Free</td>
<td>15%</td>
</tr>
<tr>
<td>Sports Supplement</td>
<td>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</td>
<td>Free</td>
<td>15%</td>
</tr>
</tbody>
</table>

Note: Other concessions for goods, persons, bodies or organisations are covered under Parts II & III of the Customs Tariff Act.

Comparative Tax Rates

<table>
<thead>
<tr>
<th>Countries</th>
<th>Personal Income Tax</th>
<th>Corporate Tax</th>
<th>VAT/ Sales Tax</th>
<th>Capital Gains Tax</th>
<th>Fringe Benefit Tax</th>
<th>Withholding Tax</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Fiji</td>
<td>20%</td>
<td>20%</td>
<td>15%</td>
<td>10%</td>
<td>20%</td>
<td>15%</td>
</tr>
<tr>
<td>2. Angola</td>
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LAWS ADMINISTERED BY FRCA

The Authority administers the following legislation: Income Tax Act (Cap 201); Customs Act 1986; Customs Tariff Act 1986; Excise Act 1986; Gambling Turnover Tax Decree 1991; Value Added Tax Decree 1991; Merchandise Marks Act (Cap 241); Wreck and Salvage Act (Cap 198); Water Resource Tax Promulgation 2008; Tax Administration Decree 2009; Superyacht Charter Decree 2010; Capital Gains Tax Decree 2011; Stamp Duties Act Cap 205; Airport Departure Tax Decree 2012; Fringe Benefit Tax Decree 2012 and Service Turnover Tax Decree 2012.
Disclaimer
These incentives are available as at 1st January 2013. For their availability and application, please contact FRCA Policy and Research Unit:
Phone: (679) 324 3021 Fax: (679) 3302 321
e-mail: FRCA-Policy&ResearchUnit@frca.org.fj