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REPUBLIC OF SOUTH AFRICA.

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**EXPLANATORY MEMORANDUM**

ON THE  
**INCOME TAX BILL, 1970.**

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GENERAL.

The Bill fixes rates of normal tax payable by individuals and companies, introduces amendments to the Income Tax Act, 1962 (Act No. 58 of 1962), hereinafter referred to as the principal Act, and the Income Tax Act, 1969 (Act No. 89 of 1969), and repeals and re-enacts certain provisions relating to the loan portions of the normal tax imposed by the Income Tax Act, 1965 (Act No. 88 of 1965), the Income Tax Act, 1966 (Act No. 55 of 1966), the Income Tax Act, 1967 (Act No. 95 of 1967), the Income Tax Act, 1968 (Act No. 76 of 1968), and the Income Tax Act, 1969.

The amendments relate mainly to the following matters:—

- (1) Consolidation of provisions relating to the loan portions of the normal tax (clauses 6 (b), 7, 26 and 27 and Schedule 2).
- (2) Partial exemption in respect of gains arising from options to acquire shares granted before 1st June, 1969 (clause 8).
- (3) Normal tax exemptions in respect of interest or dividends—
  - (a) on Bonus Bonds (clause 9 (1) (a)); and
  - (b) on certain building society shares (clause 9 (1) (b))and an increase in the exemption limit in the case of persons over the age of 60 years (clause 9 (1) (c)).
- (4) Exemption from non-residents tax on interest in respect of certain building society shares (clause 21 (1) (b)).
- (5) The deductions permitted to companies and individuals in respect of donations to universities, to colleges for the purposes of advanced technical training and to the National Study Loans and Bursaries Fund (clauses 10 (a) and 15).
- (6) The deductions permitted in respect of premiums under insurance policies on the lives of employees and company directors (clause 10 (b)).
- (7) The exporters' allowance (clause 11).
- (8) Investment allowance in respect of factory plant (clause 12).
- (9) Investment allowance in respect of buildings (clause 13).
- (10) The deduction allowed in respect of medical expenses (clause 14).
- (11) The deduction permitted in respect of the earnings of married women (clause 16).
- (12) The period during which applications may be made for the development allowance in respect of industries in economic development areas (clause 17).
- (13) The adjustment under section 37A of the principal Act in respect of taxable income derived or assessed losses incurred by companies in South-West Africa during overlapping accounting periods (clause 18).
- (14) The exemption from non-resident shareholders tax in respect of dividends distributed out of oil-mining profits (clause 19).
- (15) Non-residents tax on interest in relation to interest payments by companies to residents of South-West Africa (clause 20).
- (16) Exemption—non-resident tax on interest—residents of South-West Africa (clause 21 (1) (a)).
- (17) Public officers of South-West African companies (clause 22).

- (18) Value of livestock on hand as at the date of death of a farmer (clause 23).
- (19) Payments to Bantu persons excluded from "remuneration" for employees tax purposes (clause 24).
- (20) Additional tax on failure by provisional taxpayers to submit estimates of taxable income (clause 25).
- (21) Commencement of the Income Tax Act, 1969, in relation to certain companies deriving income in South-West Africa (clause 28).

#### CLAUSE 1 AND SCHEDULE 1.

##### *Rates of Normal Tax.*

Rates of normal tax are enacted by clause 1 and Schedule 1 to the Bill.

##### *Individuals.*

The rates for persons other than companies apply in respect of the year of assessment ending on 28th February, 1971, or 30th June, 1971, and are provided for in paragraph 1 (a) and (h) of Schedule 1. To the tax determined in accordance with the tables in paragraph 1 (a) of Schedule 1 are added a surcharge of 5 per cent out of such tax (calculated after the deduction of the rebates provided for in section 6 of the principal Act) and a loan portion equal to 10 per cent. The surcharge is not payable where the amount thereof is less than R5 and the loan levy is not payable where the amount thereof is less than R10.

##### *Companies.*

The rates for companies apply in respect of years of assessment i.e. financial years, ending during the twelve-month period from 1st April, 1970, to 31st March, 1971, and are provided for in paragraph 1 (b) to (g), inclusive, and in paragraph 1 (i) of Schedule 1. These rates, which apply in respect of taxable income derived in South-West Africa and taxable income derived in the Republic, are as follows:—

- (a) Taxable income derived otherwise than from mining—
  - (i) where derived in South-West Africa: 33½ cents per R1 (paragraph 1 (b) (i) of Schedule 1);
  - (ii) where derived elsewhere than in South-West Africa, i.e. in the Republic: 40 cents per R1 (paragraph 1 (b) (ii) of Schedule 1). To the tax determined as above is added a loan portion of 2½ per cent of such tax. This loan portion is not payable if the amount thereof is less than R5.
- (b) Taxable income derived from gold mining—
  - (i) on any mine other than a post-1966 gold mine: an amount determined in accordance with one of the formulae provided for in paragraph 1 (c) of Schedule 1 plus a surcharge (which is not payable in the case of certain assisted gold mines) equal to 5 per cent of the said amount (third proviso to the said paragraph 1 (c)) and a loan portion equal to 5 per cent of the said amount (paragraph 1 (i) (ii) of Schedule 1);
  - (ii) on a post-1966 gold mine: an amount determined in accordance with one of the formulae provided for in paragraph 1 (d) of Schedule 1, plus a surcharge of 5 per cent of the said amount (second proviso to the said paragraph 1 (d)) and a loan portion of 5 per cent of the said amount (paragraph 1 (i) (ii) of Schedule 1).
- (c) Taxable income in the form of "recoupments" of capital expenditure accruing to companies which are or have been gold mining companies:

the average rate of tax, as determined in accordance with paragraph 2 (2) of Schedule 1, or 35 cents per R1, whichever is higher (paragraph 1 (e) of Schedule 1).

- (d) Taxable income from diamond mining: a basic tax of 45 cents per R1, plus a surcharge equal to 10 per cent of the basic tax (paragraph 1 (f) of Schedule 1) plus a loan portion equal to 10 per cent of the basic tax (paragraph 1 (i) (i) of Schedule 1).
- (e) Taxable income from mining operations (other than mining for gold, diamonds or natural oil)—
  - (i) where derived in South-West Africa: 33½ cents per R1 (paragraph 1 (g) (i) of Schedule 1);
  - (ii) where derived elsewhere than in South-West Africa, i.e. in the Republic: 40 cents per R1 (paragraph 1 (g) (ii) of Schedule 1).

To the tax determined as above is added a loan portion of 2½ per cent of such tax. This loan portion is not payable if the amount thereof is less than R5.

#### CLAUSE 2.

##### *Accrual to Provincial Revenue Funds of a Portion of the Normal Tax Payable by Certain Companies.*

In terms of this clause a portion of the normal tax payable by companies on taxable income (other than taxable income from mining operations) derived elsewhere than in South-West Africa will, save where the tax accrues for the benefit of the Transkeian Revenue Fund under any law, accrue for the benefit of the respective provincial revenue funds in the proportions determined by proclamation. The portion so accruing to the provinces will be 12½ per cent of the normal tax payable. This is equivalent to 5 cents for every R1 of the taxable income on which the tax is payable.

#### CLAUSE 3.

##### *Accrual to the Revenue Fund of South-West Africa of a Portion of the Normal Tax Payable by Certain Companies.*

In terms of this clause a portion of the normal tax payable by companies on taxable income (other than taxable income from mining operations) derived in South-West Africa will accrue for the benefit of the Revenue Fund of that territory and will be paid into that fund in the manner prescribed in section 22 (2) (c) of the South-West Africa Affairs Act, 1969 (Act No. 25 of 1969). The portion so accruing will be 15 per cent of the normal tax payable. This is equivalent to 5 cents for every R1 of the taxable income on which the tax is payable.

#### CLAUSE 4.

##### *Calculation of Provincial Income Tax*

In terms of this clause the provincial income taxes payable by individuals in respect of the year of assessment ending on 28th February, 1971, or 30th June, 1971, whichever is applicable, will be calculated on the amount payable by way of normal tax under paragraph 1 (a) of Schedule 1 to the Bill after the deduction of the rebates provided for in sections 6 and 6bis of the principal Act and before the addition of the surcharge provided for in the said paragraph. The provincial income taxes will not be payable on the loan portion of the normal tax imposed by paragraph 1 (h) of Schedule 1.

## CLAUSE 5.

*The Loan Portion of the Normal Tax.*

In terms of this clause the portion of the normal tax determined in accordance with the provisions of paragraph 1 (h) or (i) of Schedule 1 is a loan portion of that tax and is repayable in accordance with the provisions of section 5 (2B) of the principal Act and the Fifth Schedule to that Act. This clause should be read with clause 7 and Schedule 2 to the Bill.

## CLAUSES 6 TO 26, INCLUSIVE.

*Amendments to the Principal Act.*

Clauses 6 to 26, inclusive, introduce amendments to the principal Act. The amendments are as follows:—

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
6 (a)	1: definition of "gross income"	The amendment is of a textual nature.
6 (b)	1: definition of "Republic"	The amendment is consequential upon the introduction of the Fifth Schedule to the principal Act (Schedule 2 to the Bill).
7	5 (2B)	The new subsection provides that the loan portions of the normal tax, as imposed by Income Tax Acts passed since 1965, shall be repayable in the manner and at the time provided in the Fifth Schedule to the principal Act (Schedule 2 to the Bill). The amendment should be read with clauses 5, 26 and 27 and Schedule 2 to the Bill.
8 (1) and (2)	8A	Section 8A of the principal Act provides for the taxing of gains which arise from options to acquire shares where such rights are obtained in respect of services rendered or by virtue of the holding of office as a director of a company. There is a partial exemption in the case of gains arising from options granted prior to 1st June, 1969. A doubt has arisen as to whether, as the law now reads, certain gains are not excluded from this partial exemption. It was the intention that the concession should apply in the case of all gains which fall within the charge and which arise from options granted prior to 1st June, 1969. The amendment now being introduced makes this clear.
9 (1) (a)	10 (1) (i) (xi)	An exemption from normal tax is provided in respect of interest on Five and three-quarter per cent Bonus Bonds. The maximum annual exemption in respect of such interest and interest on Six per cent Treasury Bonds and Five and a half per cent Jubilee Bonds is R4,650 in the aggregate.

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
9 (1) (b)	10 (1) (i) (xiii)	The maximum annual exemption from normal tax in respect of dividends on Special Tax-Free Indefinite Period shares in building societies is increased from R400 to R650. The exemption will not apply in respect of any such dividend the rate of which exceeds 6½ per cent per annum.
9 (1) (c)	10 (4) (a) (ii) 10 (4) (b) (ii)	The exemption limit from income tax in the case of persons over 60 years is increased from R1,200 to R1,350 if married and from R750 to R925 if unmarried.
9 (2)	—	The amendments introduced by clause 9 (1) (a) and (b) apply with effect from the year of assessment ended on 28th February, 1970.
10 (a)	11 (r)	This clause repeals section 11 (r) of the principal Act which provided for the deduction from income of donations made by companies (1) for the purposes of technological training at universities and (2) to the National Study Loans and Bursaries Fund. For the new provisions giving effect to the Minister's budget proposals refer to clause 15 of the Bill.
10 (b)	11 (w)	Section 11 (w) of the principal Act provides for the deduction from income of premiums under insurance policies on the lives of employees and the lives of directors of companies. The deduction was originally introduced for employers genuinely wishing to provide against the loss of the services of employees and directors on death or retirement. In terms of section 11 (w), as it now reads, the deduction of the premiums is, with some exceptions, prohibited where the policy has been pledged or ceded. This prohibition is, however, ineffectual where a policy insures an employee's or a director's life for more than one year and provides for the payment of a single premium in one year of assessment, so that the policy may in a subsequent year be pledged or ceded as security for a loan. In terms of the amendment the deduction of such single premiums will be spread over the years of assessment in the period of insurance or the period of the probable expectation of life of the employee or director concerned. Regular premiums payable at intervals of not more than one year until benefits (other than interim or temporary benefits) become payable or commenced to become payable under the policy will, subject to the conditions laid down in the Act, be deductible during the year of assessment during which the premiums become payable. Any premiums under a policy on the life of a director or employee which have not been allowed as a deduction from income may qualify for deduction in the year in which any lump sum is derived by the taxpayer under or upon the surrender or disposal of the policy, but the amount to be deducted will be limited to the amount of the lump sum.
11	11bis	In terms of this amendment the exporter's allowance is increased from 62½ per cent of

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
		<p>market development expenditure to 75 per cent of such expenditure in the case of taxpayers whose export turnover is increased by between 10 and 25 per cent of their basic export turnover and from 75 per cent to 100 per cent of market development expenditure in cases where the increase in export turnover is more than 25 per cent of basic export turnover.</p> <p>Where the increase in export turnover is less than 10 per cent of basic export turnover the allowance remains at 50 per cent of market development expenditure.</p> <p>The amendment also provides for basic export turnover to be determined at the average of the export turnover for the three preceding years instead of at the export turnover for the preceding year only.</p>
12 (1)	12 (2) and (2A)	<p>The amendment introduces an investment allowance in respect of new and unused machinery or plant which is used in a process of manufacture or a similar process and which is brought into use on or after the 13th August, 1970, but not later than the 30th June, 1973. The allowance is calculated at 15 per cent of the cost of the plant or machinery and will not be taken into account in determining the wear and tear or scrapping allowances in respect of the machinery or plant in subsequent years. Neither will it be subject to the recoupment provisions of the Act.</p>
12 (2)	—	<p>The amendment introduced by subsection (1) applies to years of assessment ending on or after the 13th August, 1970.</p>
13 (1)	13 (5), (6) and (6A)	<p>This amendment introduces an investment allowance in respect of new buildings which are used by the taxpayer for the purpose of carrying on therein a process of manufacture or a similar process or which are let to a lessee who uses them for that purpose and in respect of improvements to any such buildings. The allowance is calculated at 10 per cent of the cost to the taxpayer of the relevant building or improvements and will be made in the year of assessment in which the buildings are first brought into use or in which the improvements are completed. The allowance is restricted to buildings the erection of which is commenced on or after the 13th August, 1970, and which are brought into use not later than the 30th June, 1973, and to improvements which are commenced and completed between those dates. The allowance is not taken into account in calculating wear and tear allowance for subsequent years neither is it subject to the recoupment provisions of the Act.</p> <p>The first proviso to section 13 (5) of the principal Act which provided for an investment allowance in respect of buildings or improvements situated in an economic development area has been deleted, but the provisions are now contained in a new paragraph (c) which is added to the section.</p>

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
13 (2)	—	The amendments introduced by subsection (1) apply to years of assessment ending on or after 13th August, 1970.
14 (1)	18	In terms of section 18 of the principal Act a standard deduction from income in respect of medical and dental expenses is made in the case of natural persons. In the case of a married person the deduction is R150 and in the case of any other person it is R75. A person other than a married person is, however, entitled to the R150 deduction if such person is the sole support of a dependant. In terms of the amendment the R150 deduction will also be applicable in the case of an unmarried person (including a divorcee or permanently separated person) who is entitled to the special rebate provided in section 6 (1) (c), proviso (cc) of the principal Act for a child or children born to him. The said special rebate is applicable where the taxpayer maintains such a child out of his or her own resources.
14 (2)	—	The amendment introduced by clause 14 (1) applies with effect from the year of assessment ended on 28th February, 1970.
15	18A	<p>This clause introduces a new section 18A into the principal Act which provides for the deduction from income of donations made to universities, to colleges for advanced technical training and to the National Study Loans and Bursaries Fund. The amount of the admissible deduction is limited to 2 per cent of taxable income or R500, whichever is the greater, in the case of persons other than companies and to 5 per cent of taxable income in the case of companies. In the case of mining companies the amount of the taxable income for purposes of determining the maximum admissible deduction will be the amount of the taxable income before deducting the redemption allowance in respect of capital expenditure.</p> <p>The new provision takes the place of section 11 (r) of the Act, which is repealed by clause 10 of this Bill, and applies with effect from the year of assessment ending on 28th February, 1971. Donations made and paid into the special account established under the Technological Training Advancement Act, 1960, in respect of the year of assessment commencing on the 1st March, 1970, and which would have been deductible under section 11 (r) had that section not been repealed will be deductible under the new provision.</p>
16 (1)	20A (2) (b) (iii)	Section 20A of the principal Act provides for a deduction from income of the earnings of a married woman, up to a maximum amount of R500, less R1 for every R10 by which the combined taxable income of such woman and her husband exceeds R8,000. "Earnings" is defined in paragraph (b) of subsection (2) of the said section, and in terms of subparagraph (iii) of the said paragraph (b) certain amounts are excluded from earnings. The amendment is de-



<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
		signed to make it clear that the earnings of a married woman from a partnership of which she is a member, or a private company in which she holds shares, will not be so excluded, provided her husband is not a member of such partnership or the sole or main shareholder or one of the principal shareholders of such company.
16 (2)	—	The amendment introduced by clause 16 (1) applies with effect from the year of assessment ended on 28th February, 1970.
17	21ter (5) (b)	The period within which application may be made for the development allowance provided by section 21ter of the principal Act for industrialists in economic development areas, is extended to 30th September, 1972.
18 (1)	37A (5)	In terms of the Income Tax Act, 1969, companies which had, in respect of taxable income derived in South-West Africa, been liable for the normal tax levied by the Income Tax Ordinance, 1961, of South-West Africa, became liable for normal tax under the principal Act. The last year of assessment for companies under the Ordinance was that which ended on 30th June, 1968. The first year of assessment under the principal Act is the first financial year of a company ending after 30th June, 1968. There may in some cases be an overlapping accounting period which could result in a double assessment of taxable income or an assessed loss were it not for the provisions of section 37A (5). The amendment introduced by clause 18 (1) is designed to clarify the position in regard to those companies whose accounting years in respect of the last year of assessment under the Ordinance ended on dates other than 30th June, 1968. In terms of the amendment no adjustment may be made in respect of any taxable income derived or assessed loss incurred after the end of the said accounting year.
18 (2)	—	The amendment introduced by clause 18 (1) is to apply with effect from years of assessment ending after 30th June, 1968.
19	42 (2) (e)	Section 42 (2) (e) of the principal Act provides an exemption from the non-resident shareholders tax in respect of dividends distributed by a company out of profits made by it from oil mining. Where the oil-mining company is a wholly-owned subsidiary of a parent company, a portion of the dividends distributed by the parent company is also exempt, i.e. to the extent that the dividends declared by the parent company are derived from dividends received by it from the subsidiary and come out of profits from oil mining made by the subsidiary. In terms of the amendment, the requirement that all the issued shares of the subsidiary must be held by the holding company is relaxed and the exemption will, in the appropriate

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
		circumstances, be applicable to a portion of the dividends declared by the holding company if the non-resident shareholders' shareholdings in the holding company are in effect equivalent to a holding of more than 50 per cent of the issued share capital and the issued equity share capital of the subsidiary.
20 (1) (a)	64B (d)	This amendment is consequential upon the amendment introduced by clause 20 (1) (b).
20 (1) (b)	64B (dA)	As a result of the passing of the Companies Amendment Act, 1969 (Act No. 90 of 1969), companies formerly registered in South-West Africa under the Companies Ordinance of that territory are now registered in the Republic under the Companies Act. In terms of the amendment a company which is registered in the Republic but is managed or controlled in South-West Africa, will not be regarded as being ordinarily resident in the Republic for the purposes of section 64A (b) of the principal Act. Interest payments by such a company to persons other than companies will consequently not be subject to the non-residents tax on interest unless that company carries on business in the Republic.
20 (2)	—	The amendments introduced by clause 20 (1) are deemed to have taken effect from the commencement of the Companies Amendment Act, 1969 (Act No. 90 of 1969), i.e. 1st October, 1969.
21 (1) (a)	64C (bA)	An exemption from the non-residents tax on interest is provided in respect of interest accruing to a person who is ordinarily resident in South-West Africa.
21 (1) (b)	64C (fA)	The exemption from the non-residents tax on interest in respect of dividends on Special Tax-Free Indefinite Period building society shares is extended to include the new issue of 6½ per cent shares.
21 (2)	—	The amendment introduced by clause 21 (1) (b) is deemed to have taken effect on 5th August, 1969.
22	101 (14)	In terms of this amendment public officers of certain companies who were appointed under the Income Tax Ordinance, 1961 (Ordinance No. 10 of 1961), of South-West Africa, are in certain circumstances deemed to have been appointed under the principal Act.
23	First Schedule, paragraph 5 (2)	In terms of the amendment, the value of livestock held by a farmer at the date of his death is to be brought in at his elected standard values.
24	Fourth Schedule, paragraph 1: definition of "remuneration"	In terms of this amendment payments made to Bantu persons are excluded from "remuneration". By virtue of the provisions of section 47 of the Bantu Taxation Act, 1969 (Act No. 92 of 1969), Bantu persons are exempt from the taxes levied under the principal Act and under the

<i>Clause of the Bill</i>	<i>Section of the principal Act affected</i>	<i>Nature of Amendment</i>
		provincial income and personal tax ordinances. Employees tax deductions in the case of such persons are made under the provisions of the Bantu Taxation Act, 1969, not the principal Act.
25	Fourth Schedule, paragraph 20A (new)	<p>A provisional taxpayer whose final or last estimate of his taxable income for a year of assessment is less than 90 per cent of the actual amount of his taxable income for that year and also less than the amount of his taxable income for the latest preceding year of assessment for which an assessment has been issued, is liable in terms of paragraph 20 of the Fourth Schedule to the principal Act for the payment of additional tax. Where no estimate is made, no additional tax is payable under paragraph 20.</p> <p>The new paragraph 20A introduced by this clause provides for the payment of additional tax where a provisional taxpayer fails to submit an estimate within the prescribed period, unless the Secretary for Inland Revenue has estimated the taxable income. The additional tax under paragraph 20A is an amount equal to 20 per cent of the amount by which the taxes payable for the year of assessment exceeds the sum of the amounts (if any) of provisional tax paid and the amounts (if any) of employees tax deducted or withheld from the taxpayer's remuneration during the year of assessment. The Secretary may in certain circumstances remit the whole or any part of the additional tax.</p>
26	Fifth Schedule (new)	<p>This clause adds a new Schedule, being the Fifth Schedule, to the principal Act. This Schedule contains consolidated provisions relating to the loan portions of the normal tax imposed since 1965. This clause should be read with clauses 5, 6 (b), 7 and 27.</p>

#### CLAUSE 27.

##### *Repeal of provisions of certain Income Tax Acts.*

This clause repeals the provisions of the Income Tax Acts, 1965, 1966, 1967, 1968 and 1969, relating to the repayment of the loan portions of the normal tax imposed by those Acts. This clause should be read with clause 26, which adds a new Schedule, being the Fifth Schedule, to the principal Act, to replace the repealed provisions.

#### CLAUSE 28.

##### *Companies operating in South-West Africa: Section 50 of the Income Tax Act, 1969.*

Section 50 of the Income Tax Act, 1969 (Act No. 89 of 1969), provides for the commencement of certain amendments effected by that Act to the principal Act. The amendment introduced by this clause to the said section 50 is designed to clarify the position in regard to companies which have derived income both in the Republic and South-West Africa: the normal tax and undistributed profits tax provisions of the principal Act (as amended by the Income Tax Act, 1969) will, in terms of the amendment introduced by this clause,

Hierdie klousule moet saamgelees word met klousule 26, wat 'n nuwe Bylae, synde die Vyfde Bylae, by die Hoofwet voeg in die plek van die herroepe bepalings.

#### KLOUSULE 28.

*Maatskappye wat in Suidwes-Afrika opereer: Artikel 50 van die Inkomstebelastingwet, 1969.*

In artikel 50 van die Inkomstebelastingwet, 1969 (Wet No. 89 van 1969), word voorsiening gemaak vir die inwerkingtreding van sekere wysigings deur daardie Wet in die Hoofwet aangebring. Die wysiging wat deur hierdie klousule by genoemde artikel 50 ingevoer word, word bedoel ter opheldering van die posisie met betrekking tot maatskappye wat sowel in die Republiek as in Suidwes-Afrika inkomste verkry het: ingevolge die wysiging sal die bepalings met betrekking tot die normale belasting en die belasting op onuitgekeerde winste (soos deur die Inkomstebelastingwet, 1969, gewysig) in die geval van genoemde maatskappye van toepassing wees met ingang van die eerste boekjare van daardie maatskappye wat na 30 Junie 1968 geëindig het. Bedoelde maatskappye word dus in lyn gebring met maatskappye wat uitsluitlik in Suidwes-Afrika ge-opereer het.

#### KLOUSULE 29.

*Inwerkingtreding van Wysigings aan die Hoofwet.*

Die wysigings deur die Wetsontwerp by die Hoofwet ingevoer, sal, behalwe waar andersins bepaal of aangedui word, van toepassing wees met ingang van die jaar van aanslag wat eindig op 28 Februarie 1971 in die geval van ander persone as maatskappye, of met ingang van jare van aanslag eindigende op of na 1 Januarie 1971 in die geval van maatskappye.

#### KLOUSULE 30.

Hierdie klousule bepaal dat die Inkomstebelastingwet, 1970, ook in Suidwes-Afrika van toepassing sal wees.

#### KLOUSULE 31.

Hierdie klousule skryf die kort titel voor.

#### BYLAE 1.

*Belastingkale.*

Die bepalings van hierdie Bylae word hierbo behandel in verband met klousule 1.

#### BYLAE 2.

*Leningsgedeeltes van die Normale Belasting.*

Hierdie Bylae bevat bepalings met betrekking tot die terugbetaling van die leningsgedeeltes van die normale belasting wat deur die Inkomstebelastingwette, 1965-1969, of 'n daaropvolgende Inkomstebelastingwet gehef is of gehef mag word.

Afgesien van klein tekstuele veranderings, is die bepalings van die Bylae dieselfde as die bepalings wat deur klousule 27 herroep word.