



South African Fiscal Association

P O Box 452
CAPE TOWN
8000
Telephone: 021 794 0366
Fax: 021 794 0367
e-mail: basilnewton@iafrica.com

23 January 2007

Newsletter 1/2007

Dear members

First seminar for 2007: Section 80A

We confirm that this seminar will go ahead on the dates announced hereunder. We propose to examine the new general anti avoidance provisions in terms of section 80A. The idea is to conduct the seminar on a practical case study basis in which we will examine the application of the provisions and discuss the problems as viewed by practitioners.

Examples of possible case studies are: Will any of the following situations be caught by section 80A: A redeemable preference share with a term of three years and one day (section 8E); Issuing shares to a new investor instead of selling existing shares (avoid paying CGT); capitalising a foreign subsidiary with capital and not loans (avoid taxable interest); donate half your estate to your wife (estate planning); changing the reporting currency of a CFC to avoid tax on forex differences; decide to pay back owners capital and replace it with third party borrowings to decrease cost of capital because of deductible interest. The seminar will also deal with the question of whether the *Conhage* decision on section 103 would have been different under section 80A.

We invite members to forward further suggestions and examples of case studies by no later than the 13th February 2007.

We are in the process of approaching potential presenters for the seminar but members are also welcome to forward suggestions in this regard.

Dates, venues and booking details:

Date: 06 March 2007
Place: Cape Town
PricewaterhouseCoopers
No 1 Waterhouse Place
Century City
Time: 18h00 to 19h30

Topic: Section 80A
Speakers:
Bookings: jolandie.james@za.pwc.com Tel no: 021- 529 2368

Date: 07 March 2007
Place: Johannesburg
KPMG Auditorium, 85 Empire Road, Parktown
Time: 18h00 to 19h30
Topic: section 80A
Speakers: Advocate Peter Solomon
Bookings: albert.stevens@kpmg.co.za Tel no: 011 - 647 5716

IFA have commissioned a reprint of the Cahiers for South African members, rest assured that we will keep you posted in that regard.

We also plan to run a viewing of the DVD sessions on the Amsterdam congress and will let everyone know the venue and dates on this shortly.

Regards

Charl du Toit
President: SAFA