**BUDGET** 

2019

BRINGING NEW POSSIBILITIES ...

# BUDGET REVIEW 2019 SCoF ORAL HEARINGS

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IntegriT/X



# **2019**

#### **MATTERS FOR DISCUSSION**

- A: Technical matters
  - Retrospective amendments without clarity
  - ETI Thresholds
  - CFC high tax threshold reduction
- B: Tempting fate on debt and expenditure
- C: Tightening up estimations
- D: Sowing the seeds of change









# **BUDGET OVERVIEW**



#### RETROSPECTIVE POLICY

- Certainty underpins an economy
- Budget 2019 proposal on "dividend stripping" unhelpful as no clarity on specific abuse
- Similar to section 45 in 2011 and "bucket system used"
- Prevents and defers legitimate commercial transactions for months

#### SUBMISSION

National Treasury should better clarify what the offending practices are in the Budget and what are clearly the ones that they don't intend to address



# **BUDGET OVERVIEW**



#### EMPLOYMENT TAX INCENTIVE

- We welcome the feedback on the performance of the incentive and Treasury's initial optimism of its success
- This policy can support other initiatives and if it is working should be expanded and not stagnated

#### **SUBMISSION**

- The upper remuneration threshold increase needs further upward movement
- We would recommend National Treasury conduct research to verify that the ETI is creating **new jobs** and not just filling of current jobs, providing them an opportunity to refine the incentive over the next 10 years

### **BUDGET OVERVIEW**

# **2019**

#### **S9D HIGH TAX EXEMPTION**

- Corporate tax rates globally continue to decline with world wide average now 23% (46% in 1980) & EU 21,6%
- S9D is an anti avoidance provision requiring imputation of foreign income but is penalising SA companies for the falling global CIT rate
- The "high tax" exemption is onerous. Requires a total recalculation of foreign companies taxable income ito SA legislation.

#### **SUBMISSION**

- The 75% threshold should be reconsidered given the declining global rates.
- NT should investigate an alternative to the current high tax mechanism that is less burdensome to comply with.











#### TEMPTING FATE

'It will not be easy. There are no quick fixes. But our nation is ready for renewal. It is time for us to sow the seed of renewal and growth'

Minister of Finance, Hon. Tito Mboweni 20 February 2019





**TEMPTING FATE** 

#### QUESTION:

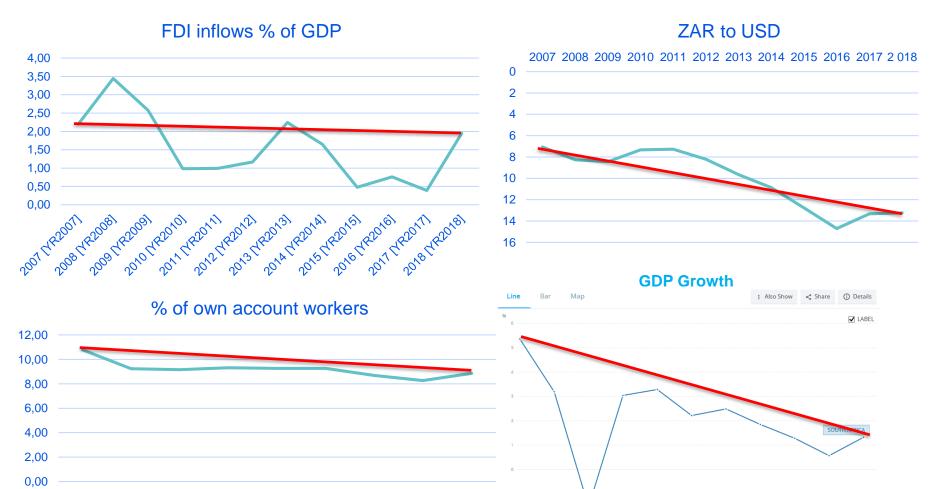
# Have we done things differently in **BUDGET 2019**?

SHORT ANSWER: **NO** 





#### TEMPTING FATE







**TEMPTING FATE** 

# Choice between the lesser of two evils





TEMPTING FATE

The reduction of debt from 1994-2007 to a targeted 10% of GDP was not without cost and tough choices were made. Many of our people had their dreams deferred on a promise that their children and grandchildren would benefit from a low debt fiscal environment.

Have we failed them?



#### **TEMPTING FATE**

#### **REALITY**

Baa2 (SA 2009) rated investment grade creditor **4 times** less likely to default than a Ba2 (SA 1994 and 2019?) sub investment grade rated creditor\*

\*Moody's study on actual default rates over 5 years





#### **TEMPTING FATE**

## THREE STRIKES TO JUNK

- Strike ONE Fitch downgrades SA to BB+ on 7 April 2017
- Strike TWO S&P downgrades SA to BB+ on 17 April 2017
- Strike THREE Moody's downgrades SA to Ba1 on 29 March 2019?

Why is Minister tempting fate and has NT quantified the impact of junk status?

Would this not be worse than cutting spending?



# **BUDGET** TIGHTENING U ESTIMATES 2019







#### **TIGHTENING UP ESTIMATES**

#### **GDP**

ACTUAL		2014	2015	2016	2017	2018 Q3		
		1,8	1,3	0,6	1,3	1,1		
Budget								
Year	Calendar Year	2014	2015	2016	2017	2018	2019	2020
2019						0,7	1,5	1,7
2018					1	1,5	1,8	2,1
2017				0,5	1,3	2	2,2	
2016			0,5	0,9	1,7	2,4		
2015		1,4	2	2,4	3			
2014		2,7	3,2	3,5				
2013		3,5	3,8					
2012		4,2						
OVERESTI	MATION %	133%	192%	483%	131%	118%		





#### **TIGHTENING UP ESTIMATES**

#### **REVENUE SHORTFALLS** 30 20 10 0 2014 2015 2016 2017 -10 -20 -30 -40 -50



-60









#### **SOWING THE SEEDS OF CHANGE**

#### Promise made MTBPS 2018:

2019/20	2020/21	2021/22							
Medium-term estimates									
1 582.0	1 705.1	1 840.0							
29.2%	29.2%	29.3%							
1 808.4	1 950.9	2 091.1							
33.4%	33.4%	33.2%							
-226.4	-245.8	-251.1							
-4.2%	-4.2%	-4.0%							
3 038.4	3 349.6	3 679.9							
56.1%	57.4%	58.5%							





#### **SOWING THE SEEDS OF CHANGE**

# Promise broken again 2019:

2019/20	2020/21	2021/22							
Medium-term estimates									
1 583.8	1 696.4	1 836.6							
29.3%	29.2%	29.4%							
1 826.6	1 948.9	2 089.0							
33.7%	33.5%	33.4%							
1 617.2	1 716.2	1 833.1							
29.9%	29.5%	29.3%							
-242.7	-252.6	-252.4							
-4.5%	-4.3%	-4.0%							







#### SOWING THE SEEDS OF CHANGE

# Maintaining credibility

#### SUBMISSION

 SCoF to reject R25bn medium term increase
 ALTERNATIVELY

• SCoF to reject R18,2bn increase SAIC for 2019/2020





