

ETXN2624 – General Deductions (Summary)

Definition – General Deduction Formula (s11(a) + s23(g))

Allows deduction of expenditure and losses actually incurred in the production of income, provided they are not of a capital nature. Known as the 'general deduction formula' or 'two-stage test'.

Stage 1: Positive test (s11(a)) – requirements to qualify.

Stage 2: Negative test (s23(g)) – exclusions/disallowances.

Stage 1 – Positive Test (s11(a))

For an amount to be deductible under s11(a):

- Must be expenditure and losses.
- Actually incurred (not just expected).
- In the production of income (directly linked to earning income).
- Not of a capital nature (must be revenue in nature).

Stage 2 – Negative Test (s23(g))

Disallows deductions if:

- Expenditure not laid out for purposes of trade.
- Expenses for personal/domestic purposes.
- Expenses recoverable under insurance/contract.
- Dual-purpose expenditure (unless apportionable).

Capital vs Revenue Expenditure

- Revenue (deductible): day-to-day operating costs (e.g., salaries, rent, repairs).
- Capital (not deductible under s11(a)): expenditure to acquire/improve fixed assets (e.g., machinery, buildings).

Capital may qualify for specific deductions under other sections (e.g., s11(e), s12C).

Timing – 'Actually Incurred'

- Expense is incurred when the taxpayer has an unconditional legal obligation to pay.
- Not when payment is made, but when liability arises.

Apportionment

- If expenditure serves both income-producing and private purposes, only the portion relating to trade is deductible.
- Example: Home office expenses – apportion between personal and business use.

Case Law Principles

Key cases interpreting s11(a):

- Port Elizabeth Electric Tramway Co Ltd v CIR – established 'closely connected' principle.
- Joffe & Co (Pty) Ltd v CIR – expenses must be 'closely linked' to income production.
- New State Areas Ltd v CIR – distinguishes capital vs revenue.
- BP Southern Africa v CIR – purpose of expense matters.

Summary Of Schlastic Principles

Ian Pickup



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