

Republic of the Philippines  
Department of Finance  
**BUREAU OF INTERNAL REVENUE**  
Quezon City

February 22, 2013

**REVENUE MEMORANDUM CIRCULAR NO. 23-2013**

**SUBJECT : Circularizing the Full Text of PEZA Board Resolution No. 12-610 dated November 13, 2012**

**TO : All Internal Revenue Officers and Others Concerned**

---

For the information and guidance of all internal revenue officials, employees and others concerned, quoted hereunder is the full text of PEZA Board Resolution No. 12-610 dated November 13, 2012:

**“RESOLUTION NO. 12-610**

RESOLVED, That the PEZA Board hereby **APPROVES** the herein proposed amendments to the PEZA Guidelines on the registration and administration of Incentives to Tourism Economic Zone (TEZ) developers and locator enterprises, as follows:

1. No more 5% Gross Income Tax (5% GIT) incentive to developers of Tourism Economic Zones (TEZs) in Metro Manila, Cebu City, Mactan Island, and Boracay Island;
2. No more Income Tax Holiday (ITH) and 5% GIT incentives to locator enterprises of TEZs in the aforesaid 4 areas, except for tax and duty-free importation and zero-VAT rating on local purchases of capital equipment;
3. Henceforth, no more new TEZs shall be established in Metro Manila, Cebu City, Mactan Island, and Boracay Island;
4. This new policy shall not have retroactive effect, however, TEZ developers/operators and locator enterprises in the above-mentioned areas that

have not signed their Registration Agreements with PEZA shall be covered by this new policy; and

5. Existing and future TEZ developers and locator enterprises outside the 4 areas shall continue to avail of the incentives granted by PEZA subject to existing guidelines, as follows:

- For TEZ developer/operator - 5% GIT; and
- For TEZ locator enterprises – ITH, 5% GIT, Tax and duty-free importation, and zero-VAT rating on local purchases of capital equipment.

RESOLVED FURTHER, That all PEZA Board Resolutions, Memorandum Circulars, and Guidelines inconsistent herewith are hereby **REVOKED** and/or **AMENDED** accordingly.

RESOLVED FURTHERMORE, That this new policy shall take effect fifteen (15) days following the publication once in a newspaper of general circulation.”

All internal revenue officials and employees are hereby enjoined to give this Circular as wide a publicity as possible.

(Original Signed)  
**KIM S. JACINTO-HENARES**  
Commissioner of Internal Revenue