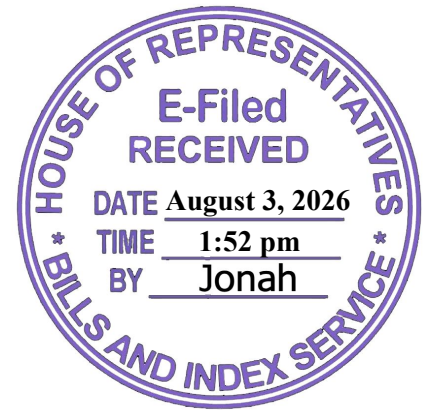


Republic of the Philippines
HOUSE OF REPRESENTATIVES
Quezon City
20TH CONGRESS
Second Regular Session

House Bill No. 10499



Introduced by: **REP. JOEL R. CHUA**

EXPLANATORY NOTE

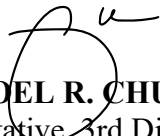
The Estate Tax Amnesty Act has enabled thousands of Filipino families to settle long-overdue estate tax obligations, transfer ownership of inherited properties, and bring previously unregistered assets into the formal economy. It has likewise encouraged voluntary tax compliance while generating additional revenues for the government.

However, many heirs and beneficiaries have yet to avail of the amnesty. Despite the extension granted, many Filipino families continue to face economic challenges brought about by the rising cost of living, inflation, and the lingering financial effects of recent years. For many, settling estate taxes remains a significant financial burden.

Extending the Estate Tax Amnesty until June 30, 2028, and expanding its coverage to estates of decedents who died on or before May 31, 2024, will provide qualified taxpayers with a reasonable opportunity to comply with their tax obligations without the burden of accumulated penalties and interest.

By giving taxpayers additional time to comply, the government not only assists families in preserving their inherited assets but also promotes a more equitable and effective tax system that ultimately benefits both taxpayers and the State.

In view of the foregoing, the immediate passage of this bill is earnestly sought.


JOEL R. CHUA
Representative, 3rd District, Manila

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Introduced by: **REP. JOEL R. CHUA**

AN ACT FURTHER EXTENDING THE ESTATE TAX AMNESTY UNTIL JUNE 30, 2028, THEREBY AMENDING REPUBLIC ACT NO. 11213, AS AMENDED

Be it enacted by the Senate and House of Representatives of the Philippines in Congress assembled:

Section 1. Declaration of State Policy - Consistent with Article VI, Section 28(1) of the Constitution, it is the policy of the State to promote a fair, efficient, and equitable system of taxation by encouraging voluntary compliance with tax laws and strengthening tax administration through measures that improve taxpayer participation and compliance. Accordingly, the State shall continue to provide qualified heirs and beneficiaries a reasonable opportunity to settle estate tax liabilities through the estate tax amnesty.

Section 2. Section 4 of Republic Act No. 11213, as amended, is hereby further amended to read as follows:

"SEC. 4. Coverage. - There is hereby authorized and granted a tax amnesty, hereinafter called Estate Tax Amnesty, which shall cover the estate of decedents who died on or before ~~[May 31, 2022]~~ **MAY 31, 2024**, with or without assessments duly issued therefor, whose estate taxes have remained unpaid or have accrued as of ~~[May 31, 2022]~~ **MAY 31, 2024**: *Provided, however,* That the Estate Tax Amnesty hereby authorized and granted shall not cover instances enumerated under Section 9 hereof."

Section 3. Section 6 of Republic Act No. 11213, as amended, is hereby further amended to read as follows:

"SEC. 6. Availment of the Estate Tax Amnesty; When and Where to File and Pay. - The executor or administrator of the estate, or if there is no executor or administrator appointed, the legal heirs, transferees or beneficiaries, who wish to avail of the Estate Tax Amnesty shall, within ~~[June 15, 2023]~~ **JUNE 15, 2025** until ~~[June 14, 2025]~~ **JUNE 30, 2028**, file, either electronically or manually, with any authorized agent bank, Revenue

District Office through Revenue Collection Officer, or authorized tax software provider, a sworn Estate Tax Amnesty Return, in such forms as may be prescribed in the Implementing Rules and Regulations. The payments of the amnesty tax shall be made, either electronically or manually, at the time the Return is filed with any authorized agent bank, Revenue District Office through Revenue Collection Officer, or authorized tax software provider: Provided, That the appropriate Revenue District Officer shall issue and endorse an acceptance payment form, in such form as may be prescribed in the Implementing Rules and Regulations of this Act for the authorized agent bank, or in the absence thereof, the revenue collection agent or authorized tax software provider concerned, to accept the tax amnesty payment: Provided, further, That for the availment of the estate tax amnesty, the requirements to be submitted to the Bureau of Internal Revenue (BIR) by the filers of the estate tax amnesty shall be limited to the following:

xxx"

Section 4. Section 8 of Republic Act No. 11213, as amended, is hereby further amended to read as follows:

"SEC. 8. Immunities and Privileges - Estates covered by the Estate Tax Amnesty, which have fully complied with all the conditions set forth in this Act, including the payment of the estate amnesty tax shall be immune from the payment of all estate taxes, as well as any increments and additions thereto, arising from the failure to pay any and all estate taxes for the period ending ~~[May 31, 2022]~~ **MAY 31, 2024** and prior years, and from all appurtenant civil, criminal, and administrative cases and penalties under the National Internal Revenue Code of 1997, as amended.

xxx"

Section 5. *Implementing Rules and Regulations (IRR)* - The Secretary of Finance shall, in coordination with the Commissioner of Internal Revenue, promulgate and publish the necessary rules and regulations within ninety (90) days from the effectivity of this Act.

Section 6. *Separability Clause* - If any provision or part hereof is declared unconstitutional, the remainder of this Act or any provision not affected thereby shall remain in full force and effect.

Section 7. *Repealing Clause* - All laws, acts, decrees, executive orders, issuances, and rules and regulations or parts thereof which are contrary to and inconsistent with this Act are hereby repealed, amended or modified accordingly.

Section 8. *Effectivity* - This Act shall take effect fifteen (15) days after its complete publication in the Official Gazette or in at least two (2) newspapers of general circulation.