



MALTA
INSTITUTE
OF TAXATION

2024 in Review

An overview of the work carried out by the Malta Institute of Taxation in 2024 and of the key tax legislative developments

December 2024

The contents of this paper are for information purposes only.

Any comments or queries concerning the contents of this paper should be addressed to the Chief Technical Officer on CTO@maintax.org or MIT@maintax.org

The Malta Institute of Taxation is a professional body for advisors, practitioners and academics operating in the field of taxation in Malta, which has as its main purposes, the promotion of tax learning and ongoing professional education, as well as contributing toward the development of local tax policy and legislation. The Institute does not provide tax advice and is not a lobby group for tax professionals.



The Malta Institute of Taxation in 2024

The following is an overview of some of the initiatives undertaken by the Institute in 2024, including the tax resources published.

MIT's Participation in Consultations with the Malta Tax & Customs Administration (MTCA)

In 2024 the MIT participated in and provided input in connection with a number of initiatives of the Office of the Commissioner for Revenue and other bodies, including:

- Consultation on the Residency programme rules
- Consultation on the guidance on the 12% VAT rate
- Consultation on the amendments to the [VAT rules for Small Undertakings](#)
- Consultation on the VAT rules for receipts
- Submission of a list of issues encountered in practice (corporate compliance)

Ongoing work of the MIT's Technical Committees

The ongoing work of the Institute representatives and/or tax sub-committees includes:

- Finalisation of papers on:
 - Participating Holding - Art 2(1)(e) ITA
 - The Allocation of Income Accruing to a Trust but which is Deemed to be Derived Directly by the Beneficiaries [Article 27D(3)(b)]
 - Taxation of individuals – investment in Crypto Currencies
 - Nomad Rules – Residence of a casual nature
 - Update to Paper on the VAT Treatment of Directors' fees
- Representation at meetings of the EU VAT Expert Group
- Participation in CFE Tax Advisor's meetings of the technical committees and contribution to CFE Opinion Statements

Other Initiatives

The technical initiatives of the MIT have also included:

- Organisation of a [VAT Practitioners' Forum](#) by the Indirect Tax Technical Committee
- Launch of the [Tax Meets Tech Talks](#) by the Tax Technology Committee
- Submissions/requests for clarification to the MTCA
- Addressing tax queries received from Members
- Ongoing updating of the MIT Guide to Completing a VAT return
- The annual Year in Review briefing (online) for MIT Members



2024 Legislative Round-up

The following is an overview of some of the key tax developments that took place between 1 January 2024 and 27 December 2024. Click on the links for further details. We invite you to follow our [News page](#) for daily tax news and updates. All news is also circulated to Members and Subscribers, in 'The MIT Weekly'.

Local Legislation

- [LN 1 of 2024](#) – Amendment to the Deduction (Income from Employment) Rules
- [LN 5 of 2024](#) – Amendment to Pensions (Tax Exemption) Rules
- [LN 6 of 2024](#) – Amendment to Tax Rebate (Pensioners) Rules
- [LN 8 of 2024](#) – Income from Artistic Activities Rules, 2024
- [LN 9 of 2024](#) – Amendment to the Transfer Pricing Rules
- [LN 12 of 2024](#) – Amendment to Fifth Schedule VAT Act (zero-rate)
- [LN 15 of 2024](#) – Malta-Switzerland Treaty
- [LN 19 of 2024](#) – Amendment to the Income Tax Exemption Order
- [LN 32 of 2024](#) – Transposition of Global Minimum Tax Directive
- [LN 43 of 2024](#) – Amendment to the Excise Duty Act
- [LN 45 of 2024](#) – Seed Investment Income Tax Rules
- [LN 62 of 2024](#) – Amendment to the Income Tax Exemption (Philanthropic Work) Rules
- [Budget Measures implementation Act](#): Act XIII of 2024 – The Budget measures Implementation Act – was published on 2 April 2024, implementing the key measures announced in October 2023 in the Budget for 2024.
- [LN 86 of 2024](#) – Amendment to the Tax Credit rules for donations to voluntary organisations
- [LN 110 of 2024](#) - Duty on Transfers by SportMalta (Exemption) Order, 2024
- [LN 130 of 2024](#) – Amendment to the Global Minimum Tax implementing Regulations
- [LN 147 of 2024](#) - Income from Sport Activities Rules 2024



- [LN 204 of 2024](#) – Amendment to the AIP rules
- [LN 205 of 2024](#) – Malta-Netherlands (Curacao) Treaty
- [LN 228 of 2024](#) - Amendment to Fifth Schedule of the VAT Act (Exemption for Dental Services and Counselling)
- [LN 229 of 2024](#) - Income Tax (Deductions) (Amendment) Rules
- VAT Act Amendment [Bill](#)
- [LN 323 of 2024](#) – Amendment to the Deductions and Tax Credits (Relevant Qualifications for Industry) Rules
- [LN 325 of 2024](#) - Periods of Applicability of Exemptions (Duty on Documents and Transfers Act) Order, 2024
- [Act XXVIII of 2024](#) – amendments to the VAT Act (VAT rules for Small Undertakings) [Find out more...](#)
- [LN 344 of 2024](#) - Value Added Tax Act (Amendment of Third Schedule) Regulations, 2024
- [Legal Notice 345 of 2024](#) – Value Added Tax Act (Amendment of Fifth Schedule) (Amendment No. 3) Regulations, 2024
- [Legal Notice 346 of 2024](#) – Value Added Tax Act (Amendment of Sixth Schedule) Regulations, 2024
- [Legal Notice 347 of 2024](#) – Value Added Tax Act (Amendment of Eleventh Schedule) Regulations, 2024
- [Legal Notice 348 of 2024](#) – Value Added Tax Act (Amendment of Twelfth Schedule) Regulations, 2024
- [Legal Notice 349 of 2024](#) – Value Added Tax Act (Amendment of Thirteenth Schedule) Regulations, 2024
- [Legal Notice 350 of 2024](#) – Value Added Tax Act (Amendment of Fourteenth Schedule) Regulations, 2024
- [Legal Notice 351 of 2024](#) – Value Added Tax (Declaration by Exempt Persons) (Repeal) Regulations, 2024
- [Legal Notice 352 of 2024](#) – Value Added Tax (Recapitulative Statement of Intra-Community Transactions) (Amendment) Regulations, 2024
- [Legal Notice 353 of 2024](#) – Value Added Tax (Tax Period) (Amendment) Regulations, 2024
- [LNs 344 and 355 of 2024](#) – Amendments to the VAT Act: zero-rate for sanitary products and certain medical accessories



- [LN 356 of 2024](#) - Pensions (Tax Exemption) (Amendment No. 2) Rules
- [LN 358 of 2024](#) - Deduction (Income from Employment) (Amendment No. 2) Rules, 2024
- [LN 363 of 2024](#) - Relief from Income Tax and from Duty on Documents and Transfers on Certain Property Transfers (Amendment) Rules, 2024

Budget 2025

- On 28 October 2024 the Minister for Finance Employment, The Hon. Clyde Caruana, delivered the Budget Speech for 2024, announcing a number of [fiscal](#) and non-fiscal measures.
- The [Budget Measures Implementation Bill](#)

MTCA Guidelines & Information

- Updated [Guideline](#) on Article 6 ITA
- [Guideline](#) on the 12% VAT Rate for Pleasure Boats
- [Guideline](#) on the 12% VAT rate for Care of the Human Body
- [Guideline](#) on the 12% VAT rate for Management of Credit & Credit Guarantees
- [Guidance](#) on the transposition of the Global Minimum Tax Directive
- [Version 4.6](#) of the DAC 2 Guidelines
- [Guideline](#) on the 0% VAT rate for disability aids & devices
- [Guideline](#) on the 12% VAT rate for Management of securities
- [Guidance](#) on the Submission of TA 22, 23 & 24
- [Guideline](#) on the 12% VAT rate for Custody of securities
- Updated [Guideline](#) on Article 6 ITA
- [Guideline](#) on the Exemption for a transfer of a dwelling house
- [Guidance](#) on the income tax treatment of interest paid under the VAT Act
- [Guideline](#) on the 0% VAT rate for inter-island sea transport



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- Updated [Guideline](#) on the VAT Healthcare Exemption
- [Guidance](#) on IFRS 17

EU Legislation & Guidance

- February 2024 Update to the [EU list of non-cooperative Jurisdictions](#)
- May 2024 – ECOFIN [approves](#) FASTER Directive
- October 2024 Update to the [EU list of non-cooperative Jurisdictions](#)
- October 2024 – [DAC 9 Proposal](#)
- November 2024 – VAT in the Digital Age package [approved](#) by Council
- EU [VAT Portal](#) for Small Enterprises launched
