

25 September 2025

## Crypto-Assets: Adoption of OECD Reporting Framework and revised CRS from 2026

On 15 September 2025, National Treasury/SARS released draft regulations to implement the OECD Crypto-Asset Reporting Framework (**CARF**) and to revise South Africa's Common Reporting Standard (**CRS**) rules. Both sets of regulations are proposed to take effect 1 March 2026.

### What's changing

#### 1. New CARF regime for crypto-asset reporting

- South Africa will adopt the OECD CARF, enabling automatic exchange of tax-relevant information on crypto-assets with partner jurisdictions.
- Who must report: "Reporting Crypto-Asset Service Providers" (CASPs) with a South African nexus must complete CARF reporting and due diligence for in-scope users/transactions.
- What must be reported: CASPs must report user and transaction data for Relevant Transactions, including amounts paid/received and aggregated values by category, with fair market values determined and reported in South African Rand and consistent valuation methods.
- **Reporting period and format:** The first reporting period runs 1 March 2026 28/29 February 2027, with annual periods thereafter. SARS will prescribe the return/filing notice and format.
- **Compliance levers:** Anti-avoidance rules apply, and CASPs must suspend (and ultimately terminate/decline) services or transactions if required self-certifications are not received within 90 days.

# 2. Revised CRS regulations

The CRS was amended to bring certain electronic money products and Central Bank Digital Currencies into scope, and to cover indirect investments in Crypto-Assets through derivatives and investment vehicles. The revised CRS will commence 1 March 2026, with updated due-diligence, effective implementation, and mandatory disclosure rule clarifications.

# Our view of the potential impact

#### For taxpayers (individuals & entities)

- Maintain detailed crypto transaction records.
- Review whether your crypto activity is on revenue or capital account and ensure the appropriate inclusion in your South African income tax returns for 2026/27 onwards.

Be prepared to complete tax residency/TIN self-certifications promptly with CASPs.

# For CASPs operating in (or from) South Africa

- Confirm if you are a Reporting CARP under the South African nexus rules.
- Ensure data capture procedures are aligned to CARF requirements.
- Ensure procedures are in place to detect and prevent structures intended to circumvent CARF obligations.

This is a significant step in normalising crypto transparency alongside mainstream financial accounts. With the Multilateral Competent Authority Agreement infrastructure in place for both CARF and CRS, SARS will likely receive structured cross-border crypto data from 2026/27. Taxpayers should expect increased matching, queries, and assessments where returns do not reconcile to third-party reports.

#### For more information and assistance, please contact:



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Kind regards, **KPMG** Tax and Legal

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