



KPMG AEOI Updates & Tracking Service

CARF/CRS Alert



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Country:	South Africa	Regime:	CARF/CRS

South Africa: Draft Regulations Issued for Implementing the CARF and Amending the CRS

On 15 September 2025, the South African Revenue Service (SARS) issued draft regulations to implement the OECD's Crypto-Asset Reporting Framework (CARF), along with related amendments to the Common Reporting Standards (CRS) within South Africa's domestic framework.

Implementation of CARF:

The implementation of CARF broadly depends on the following three key components:

- The rules, along with related commentary and guidance are structured around four key elements that will be incorporated into the domestic law, enabling SARS to collect information from reporting Crypto-Asset Service Providers (CASPs) with a nexus to South Africa:
 - The scope of crypto-assets covered;
 - The entities and individuals subject to data collection and reporting requirements;
 - The types of reportable crypto-assets transactions and associated information to be reported; and
 - Due diligence procedures to identify crypto-asset users and controlling persons, and to determine their tax jurisdictions for reporting and exchange purposes.
- The signing of the Multilateral Competent Authority Agreement on Automatic Exchange of Information under the CARF (CARF MCAA), along with the related commentary, or relevant bilateral agreements or arrangements provides the legal foundation for the exchange of information with other jurisdictions.

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- SARs will adopt the standardized XML Schema to ensure a consistent and secure exchange of CARF-related information with the competent authorities of partner jurisdictions. Reporting CASPs will also be required to use the standardized XML Schema, where permitted under domestic law, to report CARF-related information to SARS.

Amendments to the CRS:

In alignment with the OECD's amended CRS, the draft regulations propose expanding the scope of the CRS to include certain electronic money products, Central Bank Digital Currencies (CBDCs), and indirect crypto-asset investments made through derivatives and investment vehicles, which are not reportable under the CARF.

Additional proposed changes include:

- Strengthening due diligence and reporting requirements, including the identification of each Controlling Person's role;
- Establishing a new, optional Non-Reporting Financial Institution (NRFI) category for investment entities that are genuine non-profit organizations;
- Creating a new Excluded Account category for capital contribution accounts; and
- Introducing model mandatory disclosure rules (MDRs) for CRS avoidance arrangements and opaque offshore structures.

SARS invited all interested stakeholders to submit their feedback on the draft regulations during the consultation period, which ran from 15 September to 3 October 2025.

Reference: [Draft Documents for Consultation](#)

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