

Income Tax (Amendment) Bill 2019

Bill No. /2019.

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A BILL

i n t i t u l e d

An Act to amend the Income Tax Act (Chapter 134 of the 2014 Revised Edition) and to make related amendments to the Stamp Duties Act (Chapter 312 of the 2006 Revised Edition).

Be it enacted by the President with the advice and consent of the Parliament of Singapore, as follows:

EXPLANATORY STATEMENT

This Bill seeks to implement the tax changes in the Government's 2019 Budget Statement in the Income Tax Act (Cap. 134 of the 2014 Revised Edition) (the Act) and to make certain other amendments to the Act. It also makes related amendments to the Stamp Duties Act (Cap. 312 of the 2006 Revised Edition).

Clause 2 amends the definition of "Comptroller" in section 2 (Interpretation) so that, for the purpose of compounding an offence under section 34F(8), the reference to "Comptroller" in section 34F(9) does not include a Deputy Comptroller or an Assistant Comptroller.

Clause 3 amends section 10B (Profits of unit trusts) to provide that no unit trust may be approved under that section after 18 February 2019.

Clause 4 amends section 10F (Ascertainment of income from certain public-private partnership arrangements). The section provides that a person providing FRS 115 construction or upgrade services to the Government or an approved statutory body under a public-private partnership arrangement to which the financial reporting standard INT FRS 112 or SFRS(I) INT 12 applies, has a right to elect for any amount that is treated as income from such services under that financial reporting standard, to be treated as having been derived in the basis period in which those services are completed. The amendment extends this treatment to SFRS(I) 15 construction or upgrade services.

Clause 5 amends section 12 (Sources of income) to provide an exception to subsection (7). Subsection (7) provides (among other things) that rent for the use of movable property that is borne by a person resident in Singapore or a permanent establishment in Singapore, or is deductible against income accruing in or derived from Singapore, is deemed as derived from Singapore and chargeable to tax. The amendment disapplies this provision to rent that is paid for the use outside Singapore of any tangible movable property, where —

- (a) the use is connected with the purpose of an overseas trip undertaken for a trade, business, profession or vocation carried on in Singapore by a person resident in Singapore, or carried on through a permanent establishment in Singapore; or
- (b) the use is connected with the operation of a representative office outside Singapore for the purpose of a trade, business, profession or vocation carried on in Singapore by a person resident in Singapore.

Clause 6 amends section 13 (Exempt income) for the following purposes:

- (a) to delete the words "on or before 31 March 2020" in subsection (1)(zh) so that any distribution from a real estate investment trust (REIT) made

out of income that is subject to tax transparency under section 43, to an individual unit holder is (with some exceptions) exempt from tax under that provision, regardless of the date of distribution;

- (b) to delete the words “during the period from 1 July 2018 to 31 March 2020 (both dates inclusive)” in subsection (1)(zs) so that any distribution from a REIT exchange-traded fund that is approved for the purposes of section 43(2), out of income that is subject to tax transparency under section 43, to an individual unit holder is (with some exceptions) exempt from tax under that provision, regardless of the date of distribution;
- (c) to extend the date by which orders made under subsection (12) are to operate as set out in subsections (12A) and (12B), to 1 January 2026. Subsections (12A) and (12B) provide that orders made under subsection (12) which exempt from tax income received by the trustee of a real estate investment trust (REIT) or a wholly owned subsidiary of a REIT, continue to have effect on or after the stated date only in relation to income received in Singapore that is paid out of income or gains relating to immovable property outside Singapore and acquired before that date, and derived at a time when the trustee or subsidiary beneficially owns the property, or from the disposal of the property;
- (d) to grant exemption from tax of certain income derived from debt securities commonly known as insurance-linked securities, if 20% of the costs incurred in relation to the issue of the securities is paid to a person or partnership that carries on a business, trade or profession in Singapore.

Clause 7 amends section 13A (Exemption of shipping profits) which provides for certain income of a shipping enterprise to be exempt from tax under that section. The amendment provides that the tax exemption applies to income derived on or after 12 December 2018 by a shipping enterprise from the finance leasing of a Singapore ship, including any such income derived from foreign exchange and risk management activities that are carried out in connection with and incidental to the finance lease. The clause also makes consequential amendments to the definition of “finance leasing” in that section.

Clause 8 amends section 13CA (Exemption of income of prescribed persons arising from funds managed by fund manager in Singapore) to extend the date by which a company or trustee of a trust fund must be incorporated or constituted to be eligible for the tax exemption under that section, to 31 December 2024.

Clause 9 amends section 13F (Exemption of international shipping profits) which provides for certain income of an approved international shipping enterprise to be exempt from tax under that section. The amendment provides that the following income derived on or after 12 December 2018 by an approved international shipping enterprise is exempt from tax:

- (a) the finance leasing of any foreign ship to any person where the ship is used by that person for the carriage of passengers, mail, livestock or goods outside the limits of the port of Singapore;
- (b) the finance leasing of any foreign dredger, foreign seismic ship, or any foreign ship used for offshore oil or gas activity to any person for such use outside the limits of the port of Singapore;
- (c) the finance leasing of any foreign ship to any person where the ship is used by the person for towage and salvage operations outside the limits of the port of Singapore;
- (d) the finance leasing of any foreign ship for offshore renewable energy activity or offshore mineral activity to any person, for the person's operation outside the limits of the port of Singapore; and
- (e) foreign exchange or risk management activities in connection with or incidental to an activity mentioned in paragraph (a) to (d).

Clause 10 amends section 13G (Exemption of income of foreign trust) to extend the date by which a foreign trust or eligible holding company is to be constituted or incorporated for certain of its income to be exempt from tax under the section and, in relation to a trust or company that is constituted or incorporated before that date, to prescribe a later basis period in which certain conditions are to be satisfied for such exemption to apply.

Clause 11 amends section 13H (Exemption of income of venture company) to amend subsection (2C) to remove any doubt that the Minister or such person as the Minister may appoint may impose conditions in granting approval for tax exemption under the section. The clause also deletes the definition of "approved" in subsection (3) as it is not necessary.

Clause 12 amends section 13N (Exemption of tax on income derived by non-ordinarily resident individual) to provide for the phasing-out of the Not Ordinarily Resident ("NOR") Scheme. The last consecutive 5-year period for which an NOR status may be granted to an individual under that section is the period from the year of assessment 2020 to the year of assessment 2024. An application for the NOR status must be made before 1 January 2025, and the last year of assessment which an NOR individual may elect for the tax exemption to apply under that section is the year of assessment 2024.

Clause 13 amends section 13O (Exemption of income of foreign account of philanthropic purpose trust) —

- (a) to extend the date by which a philanthropic purpose trust or eligible holding company is to be constituted or incorporated for certain of its income to be exempt from tax under the section and, in relation to a trust or company that is constituted or incorporated before that date, to prescribe a later basis period in which certain conditions are to be satisfied for such exemption to apply; and

- (b) to modify the requirements to be satisfied by a corporate settlor of an account of a philanthropic purpose trust for income from such account to be exempt from tax, as follows:
- (i) the settlor must not carry on a business in or outside of Singapore (and not just in Singapore);
 - (ii) the settlor must not have 20% or more of the total number of its issued shares beneficially owned by another company which carries on a business in or outside of Singapore (and not just in Singapore).

Clause 14 amends section 13Q (Exemption of relevant income of locally administered trust) to extend the date by which a locally administered trust or holding company established for the purpose of such trust, is to be constituted or incorporated for certain of its income to be exempt from tax under the section and, in relation to a trust or company that is constituted or incorporated before that date, to prescribe a later basis period in which certain conditions are to be satisfied for such exemption to apply.

Clause 15 amends section 13R (Exemption of income of company incorporated or resident in Singapore arising from funds managed by fund manager in Singapore) to extend the date by which a company may be approved for a tax exemption under that section, to 31 December 2024.

Clause 16 amends section 13S (Exemption of income of shipping investment enterprise) which provides, among others, for income derived by an approved shipping investment enterprise from the chartering or finance leasing of any sea-going ship that was acquired by the enterprise before or during the period of its approval, and income derived from foreign exchange and risk management activities in connection with and incidental to such chartering or finance leasing, to be exempt from tax under that section.

The amendment extends the provision by exempting from tax income derived on or after 12 December 2018 by an approved shipping investment enterprise from the chartering or finance leasing of a sea-going ship, which the enterprise had chartered, or leased under a finance lease, from an approved related party. The ship must have been acquired by the related party before or during the period of the approval of the related party. Income from foreign exchange and risk management activities connected with or incidental to such chartering or finance leasing is similarly exempt from tax.

Clause 16 further amends section 13S to provide that income of an approved shipping investment enterprise derived on or after 12 December 2018 from the chartering or finance leasing of a sea-going ship that was acquired by way of a finance lease entered into with an entity that is not an approved related party, does not qualify for tax exemption.

Clause 17 amends section 13X (Exemption of income arising from funds managed by fund manager in Singapore) –

- (a) to provide that the exemption of tax under that section is also subject to the conditions of approval of a special purpose vehicle (SPV), in a case where the income to be exempt is that of an SPV;
- (b) to enable the income of an SPV of an approved master-feeder fund-SPV structure or an approved master fund-SPV structure to be approved for tax exemption under the section, even though it is not a 1st or 2nd tier SPV that is wholly owned by the master fund of the structure. To be eligible to be so approved, the SPV must either be wholly owned by the master fund, or wholly owned by the master fund and certain other persons and investment vehicles only. Such approval may only be given on or after 19 February 2019;
- (c) to enable an SPV that is not a company to be approved for tax exemption under the section; and
- (d) to extend the period by which approvals of persons for the purpose of the tax exemption under the section may be granted.

Clause 18 amends section 13Y (Exemption of certain income of prescribed sovereign fund entity and approved foreign government-owned entity) to extend till 31 December 2024 the period in which a foreign government-owned entity may be approved for a tax exemption under that section.

Clause 19 amends section 13Z (Exemption of gains or profits from disposal of ordinary shares) which provides for tax exemption on any gains or profits derived by a company from the disposal of ordinary shares belonging to it in another company. Where the company given the exemption had in an earlier year of assessment claimed a deduction or been charged to tax for certain losses or profits attributable to the disposed shares, the amount of the losses or profits will be treated as chargeable income or allowable expenses of the company in the year of the disposal. The losses and profits include a loss and profit recognised under certain financial reporting standards. The amendment adds a reference in the latter to the financial reporting standard known as SFRS(I) 9.

Clause 20 amends section 14V (Deduction for amortisation of intangible asset created under public-private partnership arrangement), which provides that where an intangible asset is created under a public-private partnership arrangement to which INT FRS 112 applies, and amortisation of the asset is recognised in accordance with the financial reporting standard known as FRS 38 in financial statements for a basis period for a year of assessment, then the amount of the amortisation that (in accordance with FRS 38) is recognised as an expense is an allowable deduction against an amount deemed as income for that basis period from providing services under the arrangement under the amended section 10F. The amendment extends the section to an intangible asset created under a public-

private partnership arrangement to which SFRS(I) INT 12 applies, and to the amortisation of such asset that is recognised under the financial reporting standard known as SFRS(I) 1-38.

Clause 21 makes various amendments to section 14ZB (Deduction for expenditure for services or secondment to institutions of a public character), which allows an entity that incurs certain expenditure when its employees provided services to an institution of a public character by arrangement with the institution and on the instruction or request of the entity, to claim an additional deduction. The amendments are for the following purposes:

- (a) where the expenditure is salary expenditure, to allow an entity to opt for the expenditure to be computed on a fixed hourly rate to be prescribed in rules;
- (b) to allow an entity to claim such deduction irrespective of the number of working hours per week of the employee who provided the services or who was seconded;
- (c) to make an amendment to subsection (13) that was inadvertently omitted when the section was amended in 2018 extending the period during which expenditure incurred may be allowed a deduction under that section.

Clause 22 inserts a new section 14ZD to enable a resident individual who derives in a basis period commission from one or more prescribed activities that is chargeable to tax under section 10(1)(a), to claim a deduction for outgoings and expenses incurred of an amount that is determined by a prescribed formula, instead of the actual amount of such outgoings and expenses.

This only applies to commission income from a prescribed activity or prescribed activities in respect of which there are deductible outgoings or expenses. For example, if an individual--

- (a) derived commission income from activity A, in respect of which the individual did not incur any deductible expense; and
- (b) derived commission income from activity B, in respect of which the individual incurred deductible expense,

5 then the prescribed formula may only be applied to the commission income from activity B and is to be computed against such income.

The application of the new tax treatment is subject to the following:

- (a) the gross amount of commission derived by the individual from a prescribed activity or prescribed activities in the basis period for which there are deductible outgoings and expenses must not exceed \$50,000;
- (b) the individual may elect to disapply the tax treatment under the section to any such commission derived in the basis period for a particular year

of assessment. If the individual carried on more than one prescribed activity, he or she may not make the election for only one or some of those activities;

- (c) the commission excludes any commission derived by the individual as a partner in a partnership.

Clause 23 amends section 19B (Writing-down allowances for intellectual property rights) to provide that, if a condition subsequent imposed for the waiver of certain requirements for the making of writing-down allowances to a company is not complied with, and the authority that waived the requirements considers that it is just and reasonable that allowances that would not have been made but for the waiver should be recovered for a particular year or years or assessment, then those allowances are treated as income of the company for the year of assessment in which the non-compliance is discovered.

Clause 23 also amends section 19B —

- (a) to provide that the period in which intellectual property rights must be acquired for writing-down allowances to be granted under subsection (1) ends on the last day of the basis period for the year of assessment 2016;
- (b) to extend the period (till the last day of the basis period for the year of assessment 2025) in which intellectual property rights may be acquired for the grant of the writing-down allowance under subsection (1AA) on the capital expenditure incurred in such acquisition.

Clause 24 makes various amendments to section 26 (Profits of insurers) that are consequential on amendments made to the Insurance (Valuation and Capital) Regulations 2004 in 2018. The amendments made to section 26 are to ensure that any increase or decrease in policy liabilities of an insurer in a basis period that is deductible or taxable continues to be net of liabilities in respect of reinsurance ceded to a reinsurer.

Clause 25 amends subsection (20) of section 34C (Amalgamation of companies), which provides that no writing-down allowances under section 19B may be granted to an amalgamated company of a qualifying amalgamation in respect of intellectual property rights that are recognised under certain financial reporting standards but were not in existence prior to the amalgamation. The amendment extends this treatment to intellectual property rights that are recognised under the financial reporting standards SFRS(I) 1-38 and SFRS(I) 3.

Clause 26 amends subsection (5) of section 34G (Modification of provisions for companies redomiciled in Singapore), which provides that where a redomiciled company incurs on or after its registration date any impairment loss from a financial asset on revenue account acquired for a trade or business outside Singapore before that date, it is allowed a deduction for that loss to the extent it becomes credit-impaired within the meaning of the financial reporting standard

known as FRS 109. The amendment adds a reference in the latter to the financial reporting standard known as SFRS(I) 9.

Clause 27 inserts a new section 34J which allows a recipient of a Maritime Sector Incentive (i.e. a company or registered business trust entitled to a tax incentive for its income under 13A, 13F, 13S or 43ZA) that has prepared its financial accounts in accordance with the financial reporting standards known as FRS 116 or SFRS(I) 16, to elect for the tax treatment set out in the section. The tax treatment is as follows:

- (a) for any year of assessment before the year of assessment (called the last year of assessment) for the basis period in which it ceases to be a recipient of the Maritime Sector Incentive—
 - i. income of an electee from a sublease of certain assets recognised by the electee as a finance lease in accordance with FRS 116 or SFRS(I) 16, will be treated as having been derived from a finance lease for the purpose of section 10D (Income from finance or operating lease); and
 - ii. income of an electee from a sublease of certain assets that is recognised by the electee as an operating lease in accordance with FRS 116 or SFRS(I) 16 will be treated as not having been derived from a finance lease for the purpose of section;
- (b) for any year of assessment before the last year of assessment, an electee is not entitled to any deduction for any outgoing or expense in relation to qualifying assets leased by the electee against income derived from the use of those assets;
- (c) for any year of assessment before the last year of assessment, no capital allowance may be made to, and no balancing charge may be made on, an electee in respect of certain assets leased by the electee;
- (d) for the last year of assessment, the tax treatment under (a), (b) and (c) will apply up till the date before the electee had ceased to be a Maritime Sector Incentive recipient;
- (e) for the last year of assessment, any capital allowance to be made to an electee must take into account any allowances that would have been made to the electee but for paragraph (c), even though no such allowance was in fact made. The balance is then pro-rated for the period remaining after the electee has ceased to be a Maritime Sector Incentive recipient;
- (f) any capital allowance to be made to an electee for any subsequent year of assessment must similarly take into account allowances not made in the past years of assessment.

Clause 28 amends subsection (16E) of section 37L (Deduction for acquisition of shares of companies), which subjects the right to a deduction for certain qualifying share acquisitions to prescribed conditions that are designed to ensure

that the acquiring company or acquiring subsidiary is not merely a passive investor. This includes a condition requiring the acquiring company or subsidiary to exert “significant influence” (within the meaning of certain financial reporting standards) over the target company. The amendment adds a reference in the latter to the financial reporting standard known as SFRS(I) 1-28.

Clause 28 also amends section 37L to provide that, if a condition subsequent imposed for the waiver of certain requirements for allowing deductions to a company for a qualifying acquisition of shares is not complied with, and the authority that waived the requirements considers that it is just and reasonable that deductions that would not have been made but for the waiver should be recovered for a particular year or years or assessment, then those deductions are treated as income of the company for the year of assessment in which the non-compliance is discovered.

Clause 29 amends section 39 (Relief and deduction for resident individual) to allow a woman resident in Singapore to claim deduction for the year of assessment 2020 and any subsequent year of assessment, in respect of the woman’s handicapped and unmarried child who was looked after by the child’s grandparent or great-grandparent in the preceding year, regardless of the child’s age. No deduction may be claimed under this subsection in any year of assessment, if the child becomes married in that year of assessment.

Clause 30 amends section 43 (Rate of tax upon companies and others) —

- (a) to extend till 31 December 2025 the date distributions from certain income by an approved REIT exchange-traded fund are to be received from a REIT, to enjoy tax transparency;
- (b) to extend till 31 December 2025 the date distributions from certain income are to be made by the trustee of a REIT or REIT exchange-traded fund, for the distributions to enjoy a concessionary tax rate of 10%; and
- (c) to insert new subsections (3D) and (3E) which applies the concessionary tax rate of 10% to a distribution made out of certain incomes during the period from 1 July 2019 to 31 December 2025 by a trustee of a REIT, or a trustee of an approved REIT exchange-traded fund, to certain persons or entities that are eligible for tax exemptions for their income under sections 13CA, 13X or 13Y.

Clause 31 amends subsection (2) of section 43A (Concessionary rate of tax for Asian Currency Unit, Fund Manager and securities company), which (among other things) enables regulations to be made to exempt from tax income of an approved bank, merchant bank, or holder of a capital markets services licence to deal in securities, from certain syndicated facilities. Regulations may further be made to treat an expected credit loss recognised under the financial reporting standard known as FRS 109, as chargeable income. The amendment adds a reference in the latter to the financial reporting standard known as SFRS(I) 9.

Clause 32 amends section 43C (Exemption and concessionary rate of tax for insurance and reinsurance business) —

- (a) to limit subsection (1)(a) (which enables regulations to be made applying a concessionary tax rate of 10% to income from certain offshore businesses of an approved insurer whose approval is granted before 1 June 2017) to income derived before 1 July 2021; and
- (b) to insert a new paragraph (ab) in subsection (1) to enable regulations to be made applying the concessionary tax rate of 10% to income derived on or after 1 July 2021 from certain general businesses and life reinsurance businesses, by an approved insurer whose approval is granted before 1 June 2017.

Clause 33 amends section 43ZA (Concessionary rate of tax for container investment enterprise) which provides for a concessionary rate of tax to be levied and paid on the income of an approved container investment enterprise accruing in or derived from Singapore from the leasing of any container or intermodal equipment that is acquired by the enterprise before or during the period of its approval, and income derived from foreign exchange and risk management activities in connection with and incidental to the leasing.

The amendment extends the section by applying the concessionary rate of tax to income derived on or after 12 December 2018 by an approved container investment enterprise from the leasing of a container or intermodal equipment, that the enterprise had leased from an approved related party. This applies only if the container or intermodal equipment was acquired by the related party before or during the period of the approval of the related party. The concessionary tax rate also applies to foreign exchange and risk management activities connected with or incidental to such leasing.

Clause 33 further amends section 43ZA to disapply the concessionary tax rate under that section to income derived by an approved container investment enterprise on or after 12 December 2018 in relation to a container or intermodal equipment acquired by way of a finance lease entered into with an entity that is not an approved related party.

Clause 34 amends section 45AA (Tax deemed withheld and recoverable from person in breach of condition imposed under section 45AA) which provides that where the payer of a payment to a non-resident person under section 45 or 45A contravenes any condition imposed under a notification made under section 13(4), the amount of tax which would have been deductible by the payer from that payment under that section is deemed to have been deducted from the payment and recoverable from the payer by the Comptroller. Section 45AA is amended to apply also to a case where the payer is a person approved under a provision of the Act set out in the new Third Schedule, and the payment is exempt from tax under a section 13(4) notification on that basis. If the approval is then revoked under the new section 105R after any such payment is made, the amount of tax which

would have been deductible by the payer from that payment under section 45 or 45A is deemed to have been so deducted and recoverable from the payer by the Comptroller.

Clause 35 amends section 45G (Application of section 45 to distribution from any real estate investment trust) —

- (a) to impose withholding tax requirements on distributions by a trustee of a real estate investment trust or an approved REIT exchange-traded fund, to persons to whom the concessionary tax rate under subsection (3C) or the new subsection (3D) or (3E) of section 43 applies; and
- (b) to extend the date by which a distribution is to be made to enjoy a withholding tax rate of 10%, to 31 December 2025.

Clause 36 inserts a new section 45J to reflect that certain withholding tax obligations under Part XII are applicable to the Government. However, no civil or criminal action may be taken against the Government to enforce such obligations.

Clause 37 amends subsection (2) of section 101 (Consent for prosecution) to enable the Comptroller to authorise an officer to compound an offence under section 34F(8). Section 34F(8) criminalises the failure to prepare transfer pricing documentation, the failure to retain in safe custody such documentation for a specified period, and the failure to comply with a notice from the Comptroller to provide a copy of such documentation.

Clause 38 inserts a new section 105R to enable the approval of a taxpayer or a matter for a tax incentive under a section of the Act prescribed in the Third Schedule to be revoked for a breach of a condition of approval. The consequence of a breach of condition of approval is set out in the new section 105R, and replaces any representation as to the consequences of such breach set out in a letter of approval given to the taxpayer concerned.

Clause 38 also inserts a new section 105S to treat, for the purposes of section 105R, every condition imposed or specified by the Minister or such person as the Minister may appoint before the commencement date of section 105S under section 43G(2), 43P(2), 43Q(2), 43R(2), 43W(3), 43Y(2), 43Z(3), 43ZB(3), 43ZC(3) or 43ZD(3) as a condition imposed on the approval in relation to a Finance and Treasure Centre or person (as the case may be) under section 43G, 43P 43Q, 43R, 43W, 43Y, 43Z, 43ZB, 43ZC or 43ZD.

Clause 439 amends section 106 to enable the Third Schedule (inserted by this Bill) to be amended by the Minister by an order.

Clause 40 makes miscellaneous amendments to sections 43G, 43N, 43P, 43Q, 43R, 43W, 43Y, 43Z, 43ZB, 43ZC and 43ZD that are related to the new section 105R. From the date of commencement of section 105R, the Minister or such person as the Minister may appoint may impose condition of approval for

any tax incentive given under section 43G, 43P, 43Q, 43R, 43W, 43Y, 43Z, 43ZB, 43ZC or 43ZD. Any such tax incentive is liable to be revoked under the new section 105R.

Clause 41 inserts a new Third Schedule, for the purposes of the new section 105R.

Clause 42 makes an amendment to subsection (18A) of section 15A (Relief from ad valorem stamp duty for acquisition of shares of companies) of the Stamp Duties Act that is related to the amendment made to section 37L of the Income Tax Act. Subsection (18A) empowers the Minister to make rules subjecting the right to relief for certain share acquisitions to conditions designed to ensure that the acquiring company or acquiring subsidiary is not merely a passive investor, including a condition that the acquiring company or subsidiary must exert “significant influence” (within the meaning of certain financial reporting standards) over the target company. The amendment adds a reference in the latter to the financial reporting standard known as SFRS(I) 1-28.

Clause 43 provides for a remission of the tax payable by a resident individual for the year of assessment 2019. The amount of remission is 50% of the tax payable or \$200, whichever is lower.

EXPENDITURE OF PUBLIC MONEY

This Bill will involve the Government in extra financial expenditure, the exact amount of which cannot at present be ascertained.
