



BIR RMC No. 55-2025 - Clarifying Section 24 of Republic Act No. 12214 [Capital Markets Efficiency Promotion Act] (CMEPA)], entitled "An Act Amending Section 22, 24, 25, 27, 28, 32, 34, 38, 39, 42, 51, 52, 56, 57, 127, 149, 174, 176, 179, 190, 199, and 258 of Republic Act No. 8424, Otherwise Known as the National Internal Revenue Code of 1997, as Amended, and for Other Purposes"

Pursuant to Section 24 of Republic Act (RA) No. 12214, otherwise known as the "Capital Markets Efficiency Promotion Act" (CMEPA), Section 258 of the National Internal Revenue Code of 1997, as amended (Tax Code), is further amended to read as follows:

*"SEC 24. Section 258 of the National Internal Revenue Code of 1997.
as amended, is hereby further amended to read as follows:*

SEC. 258. Unlawful Pursuit of Business. - Any person who carries on any business without registering the same in accordance with Section 236 shall, upon conviction for each act or omission, be punished by a fine of not less than Five thousand pesos (P5,000) but not more than Twenty thousand pesos (P20,000) and imprisonment of not less than six (6) months but not more than two (2) years: Provided, That in the case of a person engaged in the business of distilling, rectifying, repacking, compounding, or manufacturing any article subject to excise tax, he shall, upon conviction for each act or omission, be punished by a fine of not less than Thirty thousand pesos (P30,000) but not more than Fifty thousand pesos (P50,000) and imprisonment. of not less than two (2) years but not more than four (4) years. "
(Underscoring supplied)

Based on the above amendment, any person who carries on any business without registering the same with the Bureau of Internal Revenue in accordance with Section 236 of the Tax Code shall, upon conviction for each act or omission, be punished by a fine of not less than P5,000 but not more than P20,000, and imprisonment of not less than six (6) months but not more than two (2) years.

In the case of a person engaged in the business of distilling, rectifying, repacking, compounding, or manufacturing any article subject to excise tax, the penalty shall be a fine of not less than P30,000 but not more than P50,000, and imprisonment of not less than two (2) years but not more than four (4) years.

The recent amendment not only clarifies but firmly reinforces that the crime of Unlawful Pursuit of Business and its penalty under Section 258 of the Tax Code applies to failure to register a business, not to the non-payment of the P500.00 annual registration fee, which has already been repealed under RA No. 11976 (Ease of Paying Taxes Act).

To read/download RMC No. 55-2025, kindly follow this link: <https://bir-cdn.bir.gov.ph/BIR/pdf/RMC%20No.%2055-2025.pdf>.

BIR RMC No. 56-2025 - Amending certain provisions of Revenue Memorandum Circular No. 92-2024 on the payment and affixture of loose documentary stamps to taxable documents prior to notarization to align with Sections 188, 193 and 201 of the National Internal Revenue Code of 1997, as Amended (Tax Code)

This Circular is issued to amend and align the provisions of Revenue Memorandum Circular (RMC) No. 92-2024 with Sections 188, 193, and 201 of the Tax Code, specifically on the payment and affixture of loose documentary stamps to taxable documents prior to notarization.

To assist the Bureau of Internal Revenue (BIR) in its tax enforcement, assessment and collection functions, a Memorandum dated November 15, 2024 was issued by the Supreme Court reminding the notaries public to strictly comply with the provisions of the Tax Code.

To read/download RMC No. 56-2025, kindly follow this link: <https://bir-cdn.bir.gov.ph/BIR/pdf/RMC%20No.%2056-2025.pdf>.

BOC CMC 113-2025 - Implementation of Revenue Regulations No. 09-2025 which Implemented Section 295(D) of the National Internal Revenue Code of 1997 (Tax Code), As Amended by Section 18 of Republic Act No. 12066 or the “Corporate Recovery and Tax Incentives for Enterprises to Maximize Opportunities for Reinvigorating the Economy (Create More Act)”

In relation to Revenue Regulations (RR) No. 09-2025 issued by the Bureau of Internal Revenue (BIR) which took effect on 14 March 2025, the Secretary of Finance, in a letter dated 15 April 2025, clarified that sales of goods and services to domestic market enterprises or non-Registered Business Enterprises (RBEs) are now considered "local sales", which fall outside the mandate of the BOC. and is now under the jurisdiction of the BIR, for Value Added Tax (VAT) purposes.

Per Memorandum dated 22 May 2025 issued by the Deputy Commissioner, Operations Group, BIR, with subject: Verification Mechanism for VAT on Local Sales of Registered Business Enterprises, the Bureau of Customs shall allow the release of goods locally sold by RBEs upon the presentation of BIR Form No. 0605, which appears to be valid on its face and is not visibly counterfeit. Thereafter, the concerned Customs Officer should promptly send the submitted Form to BIR with the corresponding invoice, and any other relevant supporting documents, through electronic mail, for the conduct of post-verification checks and post audit.

For clarity, however, aside from the presentation of BIR Form No. 0605, the BOC Officers handling the release of the goods subject of local sale shall, collect the appropriate duties, applicable taxes other than VAT, and other fees and/or charges on the imported raw materials sold or as component of the finished product, whose collection were suspended at the time of importation by the RBE. In doing so, please be guided by the provisions of Republic Act No. 10863, otherwise known as the Customs Modernization and Tariff Act, specifically Section 105 thereof, to wit:

"Section 105. Effective Date of Rate of Import Duty. - Imported goods shall be subject to the import duty rates under the applicable tariff heading that are effective at the date of importation or upon withdrawal from the warehouse for consumption. In case of withdrawal from free zones for introduction to the customs territory, the duty rate at the time of withdrawal shall be applicable on the goods originally admitted, whether withdrawn in its original or advanced form." (Emphasis added)

Thus, the RBE shall make an appropriate goods declaration for such raw materials and pay the corresponding duties, applicable taxes except VAT, and other fees and/or charges thereon, with attached BIR Form No. 0605.

To read/download CMC 113-2025, kindly follow this link: <https://customs.gov.ph/wp-content/uploads/2025/06/2025CMC-113-2025.pdf>.

BOC Issues Updated Order on Customs Dues, Fees and Charges under CAO No. 02-2025

The Bureau of Customs (BOC) officially published [Customs Administrative Order \(CAO\) No. 02-2025](#) on May 31, 2025, introducing key amendments and clarifications to CAO No. 02-2024 on customs dues, fees, and charges. In line with President Ferdinand R. Marcos Jr.'s directive to streamline government processes and promote ease of doing business, the issuance of this updated order reflects the agency's continued efforts to make customs procedures more transparent, predictable, and responsive to the needs of stakeholders.

[CAO No. 02-2025](#) introduces revisions across key areas. These include clearer provisions on vessel supervision fees and underguarding fees for the transfer of goods at both seaports and airports. The order also refines the computation and application of the Import Processing Charge, formerly referred to as the Import Processing Fee.

The updated order made adjustments to the Authorized Economic Operator (AEO) Application Charge based on enterprise size, clarifies fees for the cancellation or modification of goods declarations due to clerical errors, and requires the standard payment of the Customs Documentary Stamp, Documentary Stamp Tax, and Legal Research Fund for every document issued.

In recognition of the operational realities faced by Customs personnel, the CAO introduces a new section detailing the reimbursement of daily travel expenses, transportation costs, and lodging for authorized personnel rendering services outside their official stations. These reimbursements are to be governed by the provisions of Executive Order No. 77, s. 2019, and are intended to support the efficiency and well-being of field-deployed Customs officers.

Furthermore, the BOC has announced the deferment Aircraft Supervision Fee under CAO 2-2024 and the implementation of which shall commence on May 1, 2025. In addition, the temporary suspension of the Certificate of Origin Processing Charge is temporarily suspended until lifted by the Commissioner and approved by the Secretary of Finance. Air Express Cargo Operators (AECOs) are likewise exempted from several customs fees due to the specialized nature of their operations, in line with the Customs Modernization and Tariff Act and existing issuances.

CAO No. 02-2025 will take effect fifteen (15) days after its publication or on June 15, 2025. The full text of the CAO is available on the Bureau of Customs website at <https://customs.gov.ph/>.

PIDS Seminar - Expanding Water Access and Promoting Organic Farming for a Food-Secure Philippines | June 26, 2025 | 9:00 AM - 11:30 AM | Virtual

Limited access to safe water, declining soil quality, rising demand for sustainable solutions in agriculture and public service delivery—these are challenges for the future of food and water security in the Philippines.

How can we better manage our water resources to serve more people equitably? What will it take to mainstream organic-based fertilizers and reduce dependence on chemical inputs?

Join the Philippine Institute for Development Studies (PIDS) on June 26 (Thursday), from 9:00 AM to 11:30 AM via Zoom, for a public webinar featuring two pressing issues: equitable water access and sustainable farming.

The first study, “[*Repurposing Rights to Expand Public Access to Water: The Case of the National Irrigation Administration*](#),” authored by PIDS Senior Research Fellow Roehlano Briones and Research Analyst Amerah Azis, examines how rethinking irrigation water rights and improving inter-agency coordination can improve water access for households. It also highlights institutional reforms, financing strategies, and private sector roles in expanding and sustaining water service delivery.

The second study, “[*Prospects for Widespread Adoption of Organic-Based Fertilizers in the Philippines: A Rapid Appraisal*](#),” by Dr. Briones, together with Project Technical Specialist Helena Luz Pastolero, and former Supervising Research Specialist Ivory Myka Galang, analyzes barriers to adoption, policy incentives, and what it will take to make organic fertilizers a scalable, sustainable norm in Philippine agriculture.

Be part of this meaningful conversation on crafting practical, inclusive, and sustainable reforms for water and agriculture in the Philippines! Register now at <https://bit.ly/pidsevent062625>.

Prepared by the FPI Secretariat

“That in all things God may be glorified”