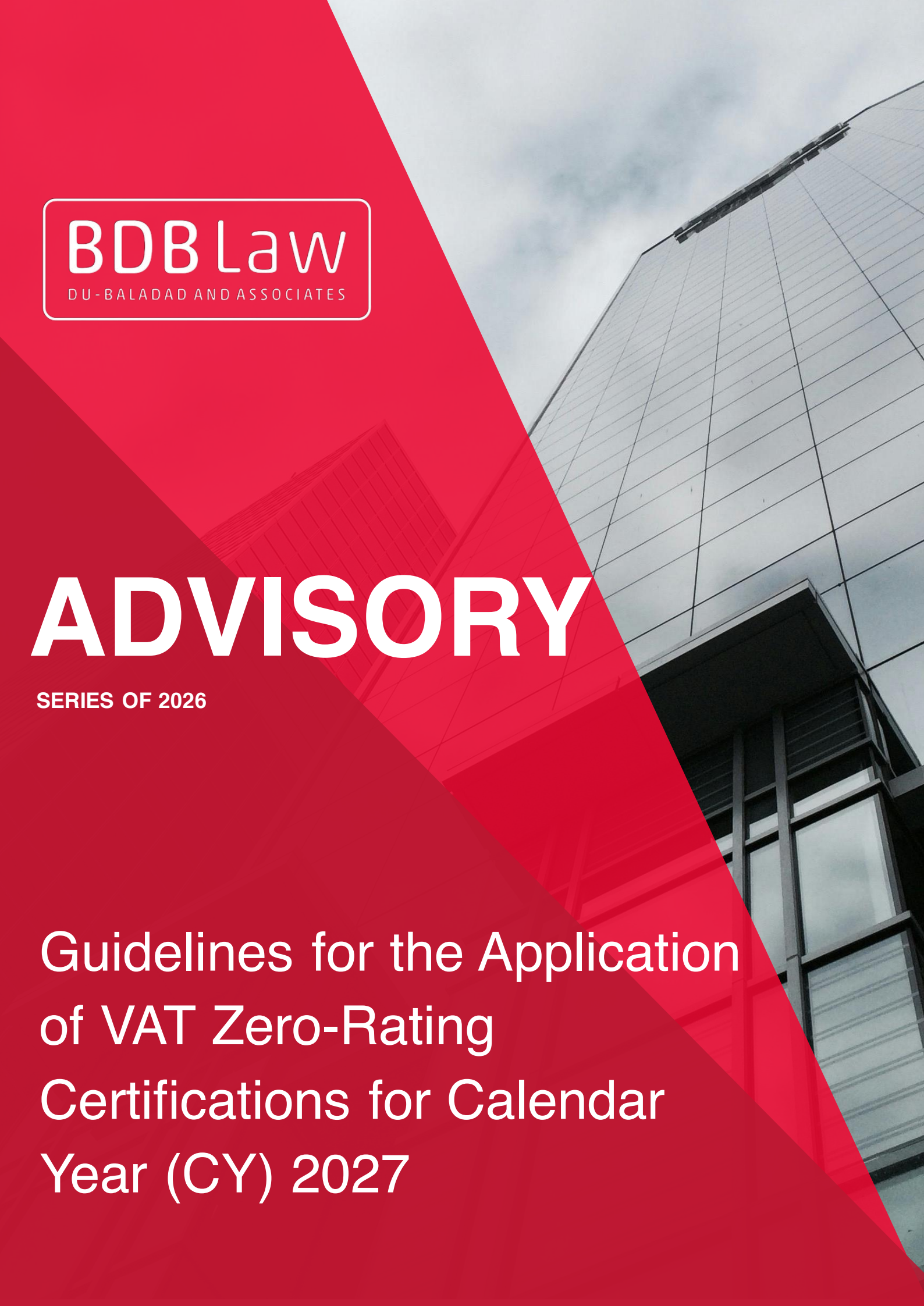




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DU-BALADAD AND ASSOCIATES

ADVISORY

SERIES OF 2026

Guidelines for the Application
of VAT Zero-Rating
Certifications for Calendar
Year (CY) 2027

GUIDELINES FOR THE APPLICATION OF VAT ZERO-RATING
CERTIFICATIONS FOR CALENDAR YEAR (CY) 2027

I. Application Period and Filing

☑ Applications for CY 2027 open starting **October 5, 2026**.

☑ Filing Schedule:

Filing Period	Coverage
October 5 to December 31, 2026	CY 2027
January 1 to March 31, 2027	CY 2027

☑ Applications filed after March 31, 2027 will only be valid from the actual date of filing.

☑ All applications must be submitted online through PEZA – The One Portal System (PTOPS) by uploading the prescribed application form and supporting documents. Alternative filing is permitted only during official PTOPS downtimes authorized by PEZA.

II. Qualification Requirements

☑ Registered Export Enterprises (REEs):

- CREATE/CREATE MORE REEs – at least 70% export sales
- Pre-CREATE Filipino-owned REEs – those covered by transitory provisions may observe a minimum 50% export sales threshold, subject to continued qualifications.
- Pre-CREATE Foreign-owned REEs - subject to the applicable 30% local-sales threshold or corresponding 70% export-sales threshold under transitory provisions.

☑ High-Value Domestic Market Enterprises (HVDMEs) – must satisfy either of the following:

- Investment capital exceeding Php 15,000,000,000 in an import-substituting sector; or
- Export sales in the immediately preceding year of at least USD 100,000,000, or its equivalent in an acceptable foreign currency.

☑ Developer/Operators, Ecozone Utilities, and Facilities Enterprises – must submit a notarized certification confirming that at least 70% of leasable/saleable areas are dedicated to REEs, or that at least 70% of power/water demand is supplied to REEs, as applicable.

PHILIPPINE ECONOMIC ZONE AUTHORITY
Memorandum Order No. 2026-027
October 3, 2026

III. Documentary Requirements & Evaluation

- ☑ REEs must submit a PEZA-prescribed Sales Summary certified by an authorized representative, which must align with books of accounts, audited financial statements, EZMPRs, and PEZA records.
- ☑ Applications will be evaluated based on registration details, registered projects, applicable export-sales thresholds, and submitted performance data (current calendar year performance for Q4 2026 filings, immediately preceding calendar year performance for Q1 2027 filings).

IV. Scope, Validity, and Compliance

- ☑ The issued Certification covers only qualified local purchases directly attributable to the registered project or activity, including incidental expenses, and does not constitute a blanket zero-VAT authority for all purchases.
- ☑ The Certification remains valid for the 2027 taxable period, contingent upon the RBE's continuous compliance.
- ☑ RBEs are reminded to ensure data accuracy. Providing false, misleading, or inaccurate information may lead to the denial, cancellation, or withdrawal of the Certification, alongside other legal liabilities.

V. Effectivity

- ☑ This Order shall take effect immediately.

Source:
PEZA Memorandum Order No. 2026-027
October 3, 2026

Learn more:

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*DISCLAIMER: This is for general information only and is not intended, nor should be construed as a substitute for tax, legal or financial advice on any specific matter.

Du-Baladad and Associates (BDB Law) is a multi-awarded, global tax law firm in the Philippines that offers services around 3 major areas of practice – **tax**, **legal** and **consulting**.

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