REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
BUREAU OF INTERNAL REVENUE

October 05, 2009

REVENUE MEMORANDUM CIRCULAR NO. 57 - 2009

SUBJECT: Publishing the Full Text of the Memorandum of Secretary of Finance Margarito B. Teves Directing BIR to Stop Issuing Tax Assessments for Taxable Year 2009 Against Cooperatives Registered with the Cooperative Development Authority based on the Old Cooperative Law.

TO : All Internal Revenue Officers, Employees and Others Concerned

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For the information and guidance of all internal revenue officers, employees and others concerned, quoted hereunder is the full text of the Memorandum of Secretary of Finance Margarito B. Teves on the above subject matter dated August 14, 2009:

"MEMORANDUM:

TO	***:***	*Hon. Lecira V. Juarez* *Chairperson* *Cooperative Development Authority*
FROM	***:***	*Gary B. Teves*
RE	*:*	*Completion in 30 Days of the Implementing Rules and Regulations (IRR) and the BIR-CDA Joint Issuance on the Tax-Related Provisions of RA 9520*
DATE	*:*	*14 August 2009*

This refers to the discussions held at the cooperatives forum hosted by the National Cooperative Movement (NCM) this morning in Club Filipino, Greenhills, San Juan City, attended by officers of the Bureau of Internal Revenue (BIR), Cooperative Development authority (COA), and the Landbank of the Philippines (LBP) and cooperative leaders.

Kindly ensure that the draft Implementing Rules and Regulations (IRR) and the draft joint issuance being planned by the BIR and the CDA on the tax-related provisions of the new Cooperative Code, Republic Act

No. 9520 (Philippine Cooperative Code of 2008) are completed within thirty (30) days or not later than 14 September 2009. The IRR and the BIR-CDA joint issuance have to be immediately subjected to formal consultations with all stakeholders before its submission to the Joint Congressional Oversight Committee on Cooperatives.

In relation thereto, please be informed that considering the number of complaint's aired by cooperatives, BIR offices have been directed to stop issuing tax assessments against cooperatives based on the old cooperative law. After the BIR-CDA joint issuance is completed, BIR officers can issue assessments, but these must be based on the new cooperative code, the IRR, and the BIR-CDA joint issuance on the tax-related provisions of the law.

For your guidance and immediate implementation.

Thank you.

(Original Signed)
GARY B. TEVES
Secretary"

All revenue officials and employees are enjoined to give this Circular as wide a publicity as possible.

(Original Signed)
SIXTO S. ESQUIVIAS IV
Commissioner of Internal Revenue