

2025-10-03

S.I. 2025 No.

Duties, Taxes and Other Payments (Exemption) Act, 2023
(Act 2023-14)

**DUTIES, TAXES AND OTHER PAYMENTS (EXEMPTION)
(CBL DEVELOPMENTS SRL AND GT DEVELOPMENT SRL) ORDER,
2025**

The Minister, in exercise of the powers conferred on him by section 4 of the *Duties, Taxes and Other Payments (Exemption) Act, 2023*, with the approval of the Cabinet, makes the following Order:

1. This Order may be cited as the *Duties, Taxes and Other Payments (Exemption) (CBL Developments SRL and GT Development SRL) Order, 2025*.

2. In this Order,

“project” means the construction, development and operation of

- (a) a hotel, villas and condominiums and ancillary buildings situate at Paradise Beach in the parish of Saint Michael; and
- (b) laundry facilities to service CBL Developments SRL and any other resort associated with the CBL Development SRL over the duration of the project;

“Societies” means

- (a) CBL Developments SRL; and
- (b) GT Development SRL,

societies organised under the *Societies with Restricted Liability Act*, Cap. 318B;

“supplies” means construction materials, machinery, equipment, furniture, fixtures, furnishings, fittings, décor, accessories and any other items imported or purchased out of a bonded warehouse for use in the project, but excludes those items which are on the List of Commodities Ineligible for Conditional Duty Exemptions set out in Parts I and II of the *Customs Tariff (Amendment) Order, 2023* (S.I. 2023 No. 69);

“unit” means a condominium or villa that forms part of the project;

“vessels” means boats, watercraft and other forms of transportation by sea.

3. This Order applies in respect of the project for a period of 25 years commencing on the 1st day of August, 2025 and concluding on the 31st day of July, 2050, unless another period is stated.

4. The Societies are exempt from the payment of

- (a) withholding tax in respect of
 - (i) interest paid to a person in respect of a loan made to the Societies for the purposes of the project;
 - (ii) royalties paid to a non-resident;
 - (iii) fees paid to a non-resident contracted to provide services or technical skills (design, construction, development and refurbishment) for the purposes of the project;
 - (iv) payments made to other non-resident contractors;
 - (v) payments made to non-resident directors; and
 - (vi) dividends paid to a shareholder; and section 65(4) and (4A) of the *Income Tax Act*, Cap. 73 shall not apply;
- (b) property transfer tax in respect of the initial sale of a unit, provided that the purchaser of the unit is not a director or shareholder of the Societies; and

- (c) import duty, excise tax and value added tax in respect of
 - (i) supplies imported or purchased for the exclusive use of the project, where the Comptroller of Customs on a certificate from the project manager is satisfied that the items being imported or purchased out of a bonded warehouse directly relate to the exclusive construction of the project; and
 - (vi) purchases of furniture, fittings, furnishings and fixtures by developers or purchasers of the unit where the items are imported or purchased within 6 months of the sale of the unit to the initial purchaser; and
- (d) land tax on the improved value of the land for a period of 25 years.

5.(1) Subject to subparagraph (4), the Societies are exempt from the payment of import duty, excise tax and value added tax, as the case may be, in respect of

- (a) supplies;
- (b) stores of food and alcoholic and non-alcoholic beverages purchased for use in the project in relation to the operation of a restaurant or other eatery or a bar;
- (c) goods and services purchased locally for use in the project;
- (d) other goods imported or purchased out of a bonded warehouse for use in the project;
- (e) vehicles powered by alternative energy, charging stations and parts for such vehicles and stations, imported for use in the project provided that the vehicles are not sold or otherwise disposed of within 3 years of importation without the prior approval of the Minister responsible for Finance, at which time the unexpired portion of the duties and taxes are payable to the State;

- (f) other vehicles and vessels, and equipment, parts and other items necessary for the maintenance of such vehicles and vessels, imported or purchased locally for use in the project, provided that the vehicles and vessels are not sold or otherwise disposed of within 3 years of importation without the prior approval of the Minister responsible for Finance, at which time the unexpired portion of the duties and taxes are payable to the State;
 - (g) furniture, fittings, furnishings and fixtures imported or purchased locally to outfit a unit, where the items are imported or purchased locally no later than 6 months from the initial sale of the unit;
 - (h) personal and households effects and vehicles of management staff who are contracted to work in Barbados and are not citizens or permanent residents of Barbados, provided that the items are
 - (i) imported within 6 months of the arrival of the staff in Barbados; and
 - (ii) not sold or otherwise disposed of within 3 years of importation without the prior approval of the Minister responsible for Finance.
- (2) Subject to subparagraph (4), the purchaser in the initial sale of a unit is exempt from the payment of import duty, excise tax and value added tax in respect of furniture, fittings, furnishings, fixtures, décor, accessories and any other items imported or purchased locally to outfit the unit where the items are imported or purchased no later than 6 months from the sale of the unit.
- (3) Subject to subparagraph (5), a purchaser of a unit is exempt from the payment of import duty and value added tax in respect of the importation of one yacht or catamaran, and equipment, spare parts and other items necessary for the maintenance of the yacht or catamaran, provided that the yacht or catamaran is not sold or otherwise disposed of within 3 years of importation.
- (4) Subparagraphs (1)(a) to (g) and (2) apply where the Comptroller of Customs is satisfied, on a certificate from the project manager, that the supplies, stores of food and alcoholic and non-alcoholic beverages, goods, vehicles and

vessels described in those subparagraphs are required for exclusive use in the project.

(5) The prohibition against the sale of a yacht or catamaran in subparagraph (3) does not apply where the sale is to another person who owns or purchases a unit.

(6) Subparagraph (3) does not apply where the purchaser of the unit is a director or shareholder of the Societies.

(7) Where a purchaser of a unit who received an exemption under subparagraph (3) sells the yacht or catamaran in contravention of that subparagraph, the duties and taxes become payable to the State.

6.(1) Employees who are employed by the Societies to work in Barbados and are not citizens or permanent residents of Barbados are exempt from the payment of

- (a) income tax on salary, where such employees spend an aggregate of 6 months or less in a calendar year in Barbados; and
- (b) contributions under the *National Insurance and Social Security Act*, Cap. 47.

(2) Employees who are not citizens or permanent residents of Barbados and are employed by a non-resident entity to work in Barbados in connection with the project are exempt from the payment of import duty, excise tax and value added tax in respect of personal and household effects imported within 2 months of arrival in Barbados.

(3) Subparagraph (2)(a) applies to a dependant of an employee described in that subparagraph as it applies to the employee, provided that the dependant is not a citizen or permanent resident of Barbados.

7.(1) Subject to subparagraph (2), where the Societies

- (a) secure a loan from a private sector lending institution for the purposes of constructing or refurbishing and upgrading a hotel, unit, restaurant, shopping plaza or retail store; and
- (b) have in an income year incurred expenditure in relation to the construction or refurbishing and upgrading,

in calculating the assessable income of the Societies for an income year, there shall be deducted an amount equal to 150 per cent of the interest paid on the loan in the income year.

(2) In this paragraph “private sector lending institution” has the meaning assigned to it by section 20 of the *Tourism Development Act*, Cap. 341.

8.(1) In calculating the tax payable by the Societies for an income year, the Societies shall be eligible for an investment tax credit that is equal to 30 per cent of the initial expenditure incurred in respect of any plant and equipment purchased for use in the refurbishing, upgrading and construction of an attraction where the cost of the plant and equipment exceeds \$100 000.

(2) The investment tax credit referred to in subparagraph (1) shall be available for set off against the tax payable; and where the excess exceeds the tax payable, the excess shall be carried forward for a period of 25 years.

(3) In this paragraph “attraction” has the meaning assigned to it by section 2 of the *Tourism Development Act*, Cap. 341.

9.(1) Where the Societies, in an income year,

- (a) have incurred expenditure for the purpose of providing accommodation or a facility for guests for reward; and
- (b) incur approved expenditure in the amount of \$200 000 000,

in calculating the assessable income of the Societies for an income year, there shall be deducted or set off against income arising or accruing to the Societies

the approved capital expenditure over a period of 25 years commencing in the income year in which the expenditure is incurred.

(2) In this paragraph “approved capital expenditure” means capital expenditure incurred in respect of the project.

10. Where the Societies have, in an income year, incurred expenditure for the purpose of

- (a) improving the waste-water disposal system, and the improvements meet the environmental standard set by the Minister responsible for the Environment; or
- (b) generating water, and the improvements meet the environmental standard set by the Minister responsible for Health,

in calculating the tax payable for an income year, the Societies shall receive an investment tax credit that is equal to 150 per cent of the capital cost of the fittings, pipes and pumps used in the construction of the waste-water disposal system or water-generating system for a period of 4 years.

11. Where the Societies have, in an income year, incurred expenditure for the purpose of improving a renewable energy system, and the improvements meet the energy standard set by the Minister responsible for Energy, in calculating the tax payable for an income year, the Societies shall receive an investment tax credit that is equal to 150 per cent of the capital cost of the construction of the renewable energy system for a period of 4 years.

12. Where the Societies have in an income year incurred expenditure in respect of

- (a) marketing;
- (b) training;
- (c) product development;
- (d) apprenticeship; or

(e) tourism research,

in calculating the assessable income of the Societies for the income year, there shall be deducted an amount equal to 150 per cent of the expenditure incurred.

13. Where the Societies have in an income year incurred expenditure in relation to the project for the purpose of acquiring Green Globe or a similar environmental certification, in calculating the assessable income of the Societies for the income year, there shall be deducted an amount equal to 150 per cent of the expenditure incurred.

14. The Societies shall notify the Minister of the reassignment of concessionary benefits to a new purchaser where the Societies sell the project or property, or sell shareholding to a third party or where there is a change in the beneficial ownership of the Societies of more than 10 per cent.

15.(1) The exemptions and other concessions described in paragraphs 4 to 13 are subject to the conditions set out in subparagraph (2).

(2) The Societies shall

- (a) commence the project by the 1st day of August, 2025;
- (b) register the project with the Minister responsible for Tourism;
- (c) keep books and records in such form and containing such particulars as may be required by the Comptroller of Customs and the Revenue Commissioner;
- (d) permit the Comptroller of Customs or his designate at all reasonable times to
 - (i) inspect the books and records; and
 - (ii) have access to any premises for the purpose of examining the fittings, furniture, fixtures, equipment and other supplies which have been imported duty free and items purchased locally for use in the project;

- (e) provide such reports to the Revenue Commissioner as are required to facilitate monitoring of the status of the exemptions and other concessions;
 - (f) furnish the Minister responsible for Finance and the Revenue Commissioner with a quarterly status report of the project, accompanied by photographs, to facilitate a proper assessment of the progress of the project;
 - (g) participate in the Balance of Payment Surveys of the Central Bank of Barbados; and
 - (h) participate in any business surveys conducted by the Barbados Statistical Service and the Minister responsible for Labour.
- (3) Where the Societies fail to comply with the conditions set out in subparagraph (2) within 90 days of written notification of the default by an authority referred to in that subparagraph, the failure shall result in
- (a) the exemptions and other concessions being withdrawn; and
 - (b) any duties and taxes waived becoming payable to the State,
- provided that the default is solely and fully attributable to the Societies.
- (4) Where an exemption or other concession is granted under this Order subject to a condition other than one set out in subparagraph (2), breach of the condition shall result in
- (a) the exemption or concession being withdrawn; and
 - (b) any duties and taxes waived becoming payable to the State.

16. This Order shall be deemed to have come into effect on the 1st day of August, 2025.

Made by the Minister this 3rd day of October, 2025.



Minister responsible for Finance

Approved by the Cabinet this 6th day of October , 2025.



Selina Grea
Cabinet Secretary