Philippine 2025 pineapple exports up 13.6%

PINEAPPLE EXPORTS are estimated to have grown 13.6% in 2025 to about 775,000 metric tons (MT), supported by increased production and strong demand from key Asian markets, according to the Food and Agriculture Organization (FAO), citing preliminary data.

In a market review, the FAO said Costa Rica likely remained the world's biggest pineapple exporter in 2025, although the FAO said its shipments were projected to decline 16% to about 2.02 million MT. The Philippines was second, ahead of Ecuador and Honduras.

The FAO attributed the increase in shipments from the Philippines to government investment in the industry.

"The Philippine Department of Agriculture made significant investments in improving yields in key production areas, including via the provision of fertilizer, packaging materials, and training in pest management, which facilitated higher output," the FAO said.

China remained the leading destination for Philippine pineapples, with exports to the market rising 19% year on year during the first nine months of 2025.

"Growth in exports to China was boosted by a weather-related decline in Chinese domestic production, which resulted in lower yields and lower quality," the FAO said.

Exports to Japan also grew substantially, increasing 27% year on year in the first nine months, the FAO said.

According to the FAO, the average export unit value of Philippine pineapple shipments was $668 per MT in the first nine months, up 6% from a year earlier.

Meanwhile, the FAO reported weaker export performance for several other Philippine fruits in 2025.

Exports of mango, mangosteen, and guava were estimated to have declined 12.25% to 8,489 MT, while papaya exports were also thought to have fallen 9.64% to 6,476 MT. — **Vonn Andrei E. Villamiel**

KATRINA MULPAT-UNSPLASH

Pangasinan solar project saved one year's processing time due to green lane system, BoI says

THE green lane system of expedited permits saved a solar project in Pangasinan over a year in processing time, the Board of Investments (BoI) said.

The BoI issued the statement on Monday in conjunction with the start of construction of Spotlight Power, Inc.'s 49.9-megawatt Mabini Solar Power Project.

"Through the facilitation and oversight of the BoI One-Stop Action Center for Strategic Investments (OSACSI), the project was able to secure key permits from separate National Government agencies on an expedited basis, resulting in significant time and cost savings," it said.

"As a result, the project reached the groundbreaking stage within 11 months from pre-development, compared with the usual two-year timeline for similar undertakings," it added.

Spotlight Power President Aris Tulalian said the green lane program "helped address regulatory bottlenecks and enabled the project to proceed on an accelerated timeline."

The project, which will be built by China CAMC Engineering Co., Ltd., is expected to contribute clean and reliable energy to the grid, support the reduction of carbon emissions, and generate employment opportunities.

It forms part of Zenith Renewables, Inc.'s portfolio of renewable energy (RE) initiatives.

"This project sends a strong signal to both local and foreign investors that the Philippines is serious about improving the ease of doing business and advancing high-impact, future-ready investments across the regions," BoI Governor Marjorie O. Ramos-Samaniego said.

At the end of 2025, OSACSI endorsed 232 projects for green lane treatment. These account for P6.11 trillion in investments and are expected to generate over 398,000 jobs.

The majority of the projects were in RE, comprising 179 projects worth over P5.2 trillion.

The others were digital infrastructure, infrastructure, food security, manufacturing, and pharmaceuticals.

The BoI tallied 16 operational green-lane projects worth P257.98 billion, while six projects worth P5.03 billion are in the pre-operations stage.

In pre-development are 163 projects worth P5.48 trillion, while 47 projects worth P362.91 billion are under construction.

Established through Executive Order No. 18, the green lane initiative aims to expedite strategic investments and translate investment commitments into actual, on-the-ground projects. — **Justine Irish D. Tabile**

Clark NSCR, Mabalacat depot progress allows fast-tracking of extension — DoTr

THE Department of Transportation (DoTr) said the North South Commuter Railway (NSCR) Extension project can now be fast-tracked after hitting certain milestones at the rail line's Clark segment and Mabalacat depot.

In a statement on Monday, the DoTr said the milestones include the installation of the first main support beam for the Clark segment and the start of rail welding at the Mabalacat depot.

It said that the installation of the initial girder will facilitate the installation of massive girders, while the rail welding will lead to the installation and connecting permanent rail across project sites.

The Clark segment or the Contract Package N-04 involves civil engineering works for about 6.5 kilometers of railway track structure which includes the rail line's underground station at Clark International Airport.

This also covers the construction of the elevated viaduct and bridge, as well as the underground tunnel to Clark airport.

The 147-kilometer NSCR will connect Malolos, Bulacan with Clark International Airport, and Tutuban, Manila with Calamba, Laguna. The P873-billion project is co-financed by the Japan International Cooperation Agency and the Asian Development Bank. It will have 35 stations and three depots.

Full operations are expected by January 2032; partial operations on the Malolos to Valenzuela segment are projected by December 2027; operations on the Clark to West Valenzuela segment are expected by October 2028.

The DoTr is also bidding out the NSCR's operations and maintenance contract, which it expects to award within the year. — **Ashley Erika O. Jose**

DOTR ACTING SECRETARY GIOVANNI Z. LOPEZ

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Thai franchisors exploring PHL expansion, DTI says

BRANDS are considering expanding their Philippine footprint through franchising, the Department of Trade and Industry (DTI) said.

In separate social media posts, the DTI said it met with representatives from Thai groups Tiptari Co. Ltd. and ZEN Corp. Group Public Co. Ltd. to discuss possible expansion.

The discussions with Tiptari centered around its ChaTraMue brand's expansion plans in the Philippines, it said.

"The meeting underscored ChaTraMue's rapid growth since its 2023 entry, plans to expand beyond Metro Manila, and its strategy to grow through franchising and product distribution," it added.

ChaTraMue currently operates 14 Philippine outlets.

"The company also expressed interest in expanding its franchising network and identifying local partners for ready-to-drink beverages and ice cream products," it added.

Meanwhile, ZEN Group, which operates Khiang Restaurant, discussed plans to expand its Thai and Japanese dining concepts in the Philippines, it said.

"Khiang currently operates two branches in Metro Manila, (while) additional outlets are scheduled to open in 2026," it added. — **Justine Irish D. Tabile**

OPINION

Revisiting the TTRA/RFC rules in the digital era

LET'S TALK TAX
GEMMALU MOLLENO-PLACIDO

Earlier this year, the Bureau of Internal Revenue (BIR) launched DARES, its five-point reform and legacy agenda. DARES stands for Digital and Data Transformation, Audit Reform and Accountability, Revenue Collection and Tax Base Protection, Employee Empowerment and Welfare Promotion and Service Excellence and Stakeholder Engagement. During the launch, the Secretary of Finance emphasized the government's intention to improve the ease of doing business. Relevant to this, the BIR issued Revenue Memorandum Order (RMO) 1-2026, the updated audit framework which aims to strengthen transparency, accountability, and due process, and institutionalize stronger system-based and control-driven audits.

I would like to particularly highlight the RMO's mandatory use of the standardized audit checklist, which should serve as a uniform reference for identifying, requesting, receiving, and evaluating documents necessary for audit. As a tax practitioner, I have experienced taxpayers with pending applications for tax exemption under a treaty assessed for tax deficiency for the type of tax it was seeking an exemption from.

TAX TREATY RELIEF AND REQUESTS FOR CONFIRMATION

While the RMO demonstrates the BIR's move towards more efficient tax administration, there is still room to improve one notable process relevant to tax assessment, the Tax Treaty Relief Application (TTRA)/Request for Confirmation (RFC). This process seeks to establish that certain income is exempt from tax and consequently from withholding or that certain incomes are subject to lower withholding rates as provided in a tax treaty. The usual challenge for taxpayers arises when the BIR audit includes findings related to an item that is the subject of a pending application for tax treaty relief or RFC with the BIR, in which the taxpayer is unable to provide a certificate of entitlement (CoE) to the treaty.

The BIR's RMO No. 14-2021, RMC 77-2021 and RMC 20-2022 streamlined the requirements for taxpayers availing the benefits of the applicable treaty. Five years later, it appears that securing a ruling for TTRA or RFC is still challenging as taxpayers deal with two major points. First, the TTRA or RFC still takes years to process. Second, the strict documentary requirements provided under RMO 14-2021, RMC 77-2021 and RMC 20-2022, especially related to authentication and requests for alternative documents, lead to delays that expose the taxpayers to possible tax deficiency assessments.

TIMELINE FOR ISSUING RULINGS

If the BIR has not yet released the ruling or CoE, then the taxpayer received the electronic Letter of Authority (eLoA), the tendency is for the BIR to assess the taxpayer with final withholding income tax and/or final withholding Value-Added Tax (VAT) for certain incomes such as business profits, capital gains, interest, royalties, and dividends. This scenario often leads to confusion, especially among foreign investors who are used to doing business with our neighbors. The confusion stems from the fact that they have already submitted and completed the TTRA or RFC application, yet, when they are subjected to audit, they are required to submit the same set of documents. Moreover, there are instances where the lack of a ruling or CoE will be the basis for the examiners to insist that the taxpayer is liable for withholding tax since the BIR has not yet issued one.

While it is truly understandable that the average timeline for securing the CoE is due to the volume of applications for rulings, perhaps the BIR could revisit the possibility of going digital for TTRA and RFC applications. The BIR's launch of its ORUS and VDS portals appears to point to the potential for efficiencies. The Securities and Exchange Commission (SEC) has been going big on online portals, such as online registration with SEC Zero and the e-amend portal, making the registration and amendment processes faster and more efficient. With these recent developments, exploring the possibility of submission of documents for TTRA and RFC applications through an online portal could minimize delays in reviewing documents and ultimately lead to faster acceptance and processing of TTRA or RFC applications.

REVISITING TTRA/RFC DOCUMENTARY REQUIREMENTS

Speaking of documentation, the BIR could also consider the possibility of keeping up with technology, especially in terms of requiring specific documentary requirements for TTRA/RFC applications. RMO 14-2021, RMO 77-2021 and RMC 20-2022 have strict documentary requirements, and in instances where the specific document is not available, taxpayers are left to rely on the interpretation of the BIR officers in terms of alternative documents.

To illustrate, one of the requirements in applying for RFC is to submit contracts signed by the authorized signatories of the contracting parties. In addition to the actual contract, which must be authenticated/apostilled if executed abroad, the BIR would require a board resolution or secretary's certificate showing that the authorized signatory was authorized by the board. Rightfully so, authority to sign must be established. However, in this digital age, the contracts are usually signed electronically; hence, there are contracts wherein the actual signature of the signatory is not visible. Further, for some multinationals and groups of companies, contracts are system-generated, which no longer contain signatures of authorized signatories as these contracts are merely downloaded in their platform or website; thus, complying with the BIR's documentary requirements becomes a challenge for applicants. There were also instances that, due to data privacy, required documents from non-residents could not be complied with. Moreover, due to digitalization, many services are now rendered through digital platforms hosted abroad, and requiring a certificate of completion from the non-residents now becomes onerous.

In these instances, where providing the applicants with alternative documents is susceptible to various interpretations, the applicant is left to rely on the discretion of the evaluator. This could sometimes contribute to delays as various examiners/evaluators provide different options as well. Hence, these factors, among others, could eventually contribute to the taxpayer's exposure to a heightened tax audit risk despite the pending application for RFC or TTRA.

The digitalization of TTRA and RFC applications would enable the BIR to immediately review the documents submitted via the portal and in case of BIR audits, the BIR will be able to easily retrieve files for cross referencing purposes. Internally, the digitalization will help the BIR to have a repository of all applications, preserve the records, and allow smooth transition of files in case of personnel movement. Thus, enabling the BIR to focus more on its other collection efforts. Clearly, digitalization will simplify the process for both the government and the taxpayers.

The April 30 deadline for filing TTRA/RFCs for the transactions covered under a calendar year is approaching, and taxpayers are contemplating again if it is worthwhile filing the application now or just wait for the BIR audit, as they will be required to provide the same supporting documents anyway, given the lengthy and unpredictable processing time. Maybe it is time for the BIR to revisit its current TTRA/RFC regulations to align with the Bureau's current effort for a more transparent, structured, and efficient tax assessment framework. Businesses are veering away from the traditional ways of executing contracts due to digitalization and effectively changing the tax landscape. Simplifying documentary requirements which are easy to comply with and appropriate to the evolving digital world of business would surely attract more investors and help our economy.

Let's Talk Tax is a weekly newspaper column of P&A Grant Thornton that aims to keep the public informed of various developments in taxation. This article is not intended to be a substitute for competent professional advice.

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