

Bhurtun Chambers

ARC Findings Update No. 8 of 2024:

**MEERA DEVI BRINDA DOOKHURRUN v DIRECTOR-GENERAL,
MAURITIUS REVENUE AUTHORITY**

ARC/IT/036-22

13 September 2024

FACTS

This was an appeal regarding the disallowance by the MRA of the Applicant's claim for interest relief under **S.27A Income Tax Act (ITA)**.

The MRA argued that relief under **S.27A ITA** is applicable only for loans used exclusively for purchasing or constructing a home, and as the Applicant's loans were primarily for refinancing and renovations, interest relief could not be granted.

The Applicant argued that the disallowance of interest relief was contrary to **S.27A ITA**, because she did not own any other residential properties and had taken additional loans solely to complete her house, which was not in a habitable state.

ISSUE

The issue to be determined by the ARC was whether the Applicant was eligible for interest relief in light of **S.27A ITA**.

CONCLUSION AND REASONING OF THE ARC

The ARC set aside the Applicant's representations.

In doing so, the Committee explained that established legal framework and precedents clearly dictate that loans taken for refinancing or renovations do not meet the criteria for interest relief under **S.27A ITA**.

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