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IRAS e-Tax Guide

GST Guide on Specialised Warehouse Scheme and Zero-rating of Supplies (Sixth Edition)

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1 Aim

- 1.1 This guide provides information on the Specialised Warehouse Scheme which allows the zero-rating of prescribed services performed on prescribed goods stored in an Approved Specialised Warehouse, and the lease/tenancy/ licence to occupy a storage space in an Approved Specialised Warehouse¹.
- 1.2 The information includes the list of prescribed goods and services for the scheme, eligibility criteria, application procedure, validity period of the scheme, responsibilities of the GST-registered person under the scheme and documentation requirements to support the zero-rating.
- 1.3 You should read this guide if you are GST-registered and are in the business of storing your overseas customer's goods in Singapore for an extended period of time and/or providing services on these goods before they are exported.

2 At a glance

- 2.1 A supply of service may be zero-rated if the customer is an overseas person and the service is supplied directly in connection with goods for export². However, where goods are stored in Singapore for an extended period of time, businesses may face difficulty in establishing that the goods are for export when billing their overseas customers.
- 2.2 The purpose of the Specialised Warehouse Scheme (SWS) is to facilitate zero-rating relief on the following supplies of:
 - (a) Prescribed services³ performed on prescribed goods stored in an Approved Specialised Warehouse, made to and directly benefiting overseas persons; and
 - (b) A lease/ tenancy/ licence to occupy storage space in an Approved Specialised Warehouse by the operator of an Approved Specialised Warehouse to overseas persons.
- 2.3 With effect from 1 Jan 2020, you may also zero-rate your supply of prescribed service in paragraph 2.2(a) if the supply is made to an overseas person and directly benefiting a GST-registered person who belongs in Singapore. Please refer to paragraph 3.3 for more details.

¹ This e-Tax Guide replaces the IRAS' e-Tax Guide "GST: Specialised Warehouse Scheme and Zero-rating of Supplies (Second Edition)" published on 23 Oct 2012.

² This is provided under Section 21(3)(g) of the GST Act.

³ The prescribed services can be performed by the operator of the Approved Specialised Warehouse or other GST-registered businesses.

3 Background

3.1 In recognition that most of the goods stored in warehouses used for providing specialised storage facilities to overseas persons will eventually be exported, the Specialised Warehouse Scheme (SWS) was introduced on 1 Oct 2011 to promote the use of such specialised storage facilities in Singapore. Zero-rating provisions were also introduced to zero-rate prescribed services performed on prescribed goods stored in a warehouse approved under SWS (“Approved Specialised Warehouse”) in view of the international character of such services performed on qualifying goods.

3.2 The relevant legislative provisions are summarised as follows:

Scope	Supporting Legislation
Specialised Warehouse Scheme	Section 21(7A) of the GST Act and Regulation 106B of the GST (General) Regulations
Zero-rating of prescribed services performed on prescribed goods stored in an Approved Specialised Warehouse	Section 21(3)(y) of the GST Act, Paragraph 10 and Ninth Schedule of GST (International Services) Order See Paragraph 3.3 for enhancement with effect from 1 Jan 2020
Zero-rating of lease/ tenancy/ licence to occupy a storage space in an Approved Specialised Warehouse	Section 21C of the GST Act

Amendment to “Directly Benefit” condition

3.3 Prior to 1 Jan 2020, a supply of prescribed services must “directly benefit” a person belonging outside Singapore before zero-rating can apply under section 21(3)(y). With the introduction of reverse charge⁴ effective from 1 Jan 2020, you may also zero-rate prescribed services supplied to an overseas person where the prescribed services “directly benefit” GST-registered persons belonging in Singapore⁵. The GST-registered beneficiary will be required to apply reverse charge on services⁶ procured from the overseas person if it is not entitled to full input tax recovery.

3.4 Paragraphs 6 to 11 of this guide provides the details of SWS. Paragraphs 12 and 13 of this guide explain the conditions for zero-rating and the operational details.

⁴ For more details on reverse charge, please refer to the e-Tax Guide “GST: Reverse Charge”.

⁵ The law change will not affect the GST treatment of the supply of a lease/tenancy/licence to occupy storage space in an Approved Specialised Warehouse to overseas persons.

⁶ Including any recovery of costs charged to the local GST-registered beneficiary by the overseas person.

4 Glossary

Zero-GST/ Licensed Warehouses

- 4.1 These are designated areas approved by Singapore Customs for storing imported non-dutiable/ dutiable goods with GST suspended. The licensing and operation of Zero-GST and Licensed Warehouses are administered by Singapore Customs.
- 4.2 Under the Zero-GST Warehouse Scheme and Licensed Warehouse Scheme, there are 3 types of licences, namely Type I, Type II and Type III, to cater to the different business needs. Type III licence allows operating of multiple Zero-GST or Licensed Warehouses under a single licence of the respective scheme and goods can be moved freely between the warehouses.
- 4.3 For more information, please refer to Singapore Customs' webpage on [Zero-GST Warehouse Scheme](#) and [Licensed Warehouse Scheme](#).

5 Qualifying Goods

5.1 Only warehouses that store certain categories of goods are eligible for the SWS, and only supplies related to such goods may qualify for the zero-rating relief explained in this guide. The categories of goods are:

- (a) a work of art;
- (b) an antique;
- (c) an artefact;
- (d) a collector's item;
- (e) a precious metal (gold, silver, palladium, platinum);
- (f) a precious stone (diamond, ruby, sapphire, emerald);
- (g) jewellery; and
- (h) wine.

Please refer to [Appendix A](#) for the definition of each category of qualifying goods for the purpose of SWS and the zero-rating relief.

6 Eligibility Conditions

For the avoidance of doubt, the conditions and/or requirements in paragraph 6.2 have the force of law.

- 6.1 If you operate a warehouse used for your business of storing qualifying goods, you may apply for the SWS. The Comptroller of GST grants approval on a warehouse-by-warehouse basis if the eligibility requirements are satisfied. A warehouse with approved status under the scheme is known as an "Approved Specialised Warehouse".
- 6.2 For a warehouse to be eligible for SWS, you (as the operator of the warehouse) must satisfy the following requirements in respect of the warehouse:
- (a) You are a GST-registered business.
 - (b) The warehouse is already licensed by Singapore Customs as a Zero-GST Warehouse (Type I or II licence) or Licensed Warehouse (Type I or II licence)⁷.

⁷ For more information, please refer to Glossary in paragraph 4.

- (c) You are the licensee of the Zero-GST/ Licensed Warehouse and use the warehouse for your business of storing goods for your customers.

- (d) Your overseas⁸ customers (who must either own the goods or act on behalf of another overseas person) must account for more than 90% of the total number of customers who store goods in the warehouse.

In your application, you will need to declare the number of overseas customers and total number of customers (both local and overseas) as at the date of application. If you wish to provide projected numbers, please state the date on which you based your projection and provide us with your basis of projection.

- (e) The qualifying goods (refer to paragraph 5) stored in the warehouse must account for more than 90% of the total units of goods stored in the warehouse.

In your application, you will need to declare the total units of qualifying goods and the total units of goods (including non-qualifying goods) stored for your customers in the warehouse in a period of 12 months. The 12-month period will be the immediate past financial year or any 12 continuous calendar months within the past 18 calendar months. For a newly established business, you may use projected numbers and provide us with your basis of projection.

- (f) The units of qualifying goods removed for export must account for more than 90% of the total units of qualifying goods removed from the warehouse.

In your application, you will need to declare the total units of qualifying goods removed for export and total units of qualifying goods removed from the warehouse (into customs territory⁹ and for export) in a period of 12 months (i.e. the immediate past financial year or any 12 continuous calendar months within the past 18 calendar months). For a newly established business, you may use projected numbers and provide us with your basis of projection.

- (g) You have good compliance records with IRAS.

⁸ If the person is an individual, he shall generally be treated as belonging overseas if his residential address is not in Singapore. If the person is a business (e.g. company), it shall generally be treated as belonging overseas if it does not have any business establishment or fixed establishment in Singapore.

⁹ If you are able to track, your calculation of “total units of prescribed goods removed from the warehouse” may exclude goods that are temporarily removed from the warehouse under customs control for an event (e.g. auction, exhibition), and returned to the same Zero-GST/ Licensed Warehouse after the event.

You must have a good history of payment for GST and other taxes, and submission and completion of GST returns.

- (h) You have good compliance records with Singapore Customs.

You must not have any major violation of Singapore Customs' regulations and requirements.

- (i) You have performed an Assisted Self-Help Kit (ASK) Annual Review or have committed to participate in Assisted Compliance Assurance Programme (ACAP)¹⁰.

- 6.3 Since the SWS is intended for warehouses providing specialised storage for high-value goods, the warehouse is expected to have an electronic security system (e.g. access control) and/or climate control system (e.g. temperature and humidity control). In addition, the goods stored in the warehouse are expected to be insured.

7 Application Procedure

For the avoidance of doubt, the conditions and/or requirements in paragraphs 7.1 and 7.3 have the force of law.

- 7.1 To apply for the SWS, please complete and submit the application form (GST F26) which can be downloaded from IRAS' website¹¹. The application form must be submitted together with the following documents:

- (a) a copy of your licence for Zero-GST or Licensed Warehouse;
- (b) documents to support the projected numbers declared (if applicable);
- (c) a certified¹² "ASK: Declaration Form on Completing Annual Review & Voluntary Disclosure of Errors" (Section 3 of ASK), unless you have committed to participate in ACAP.

If you have a valid ACAP status, the ASK declaration form is not required if you perform a Post ACAP Review (PAR) and submit the "PAR Declaration" form (GST F28/F28A) or apply for ACAP renewal (GST F29).

¹⁰ For more information on ASK and ACAP, please visit our website at www.iras.gov.sg and click Taxes > Goods & Services Tax (GST) > Getting it right > Voluntary Compliance Initiatives.

¹¹ Go to www.iras.gov.sg > Quick Links > Forms > GST > GST Schemes.

¹² The ASK declaration form has to be certified by either your own in-house tax professional or externally engaged tax professional who is accredited as an Accredited Tax Practitioner (GST) or Accredited Tax Advisor (GST) with the Singapore Chartered Tax Professionals Limited ("SCTP"). For more information on accreditation, please visit <https://sctp.org.sg>.

- 7.2 If you wish to have more than one of your warehouses approved under the SWS, you will need to submit separate applications in respect of each warehouse. Approval will be granted to warehouses individually.
- 7.3 In the course of processing your application, IRAS may request for other documents to support your declarations, or request a visit to your business premises to assess your business and review your accounting and business records.
- 7.4 You will be informed of the outcome of your application within one month from the date of receipt of your application. This is provided that your application form is fully completed and all relevant supporting documents have been received.

8 Validity Period of Approval

For the avoidance of doubt, the conditions and/or requirements in paragraphs 8.1 and 8.3 have the force of law.

- 8.1 If your application is successful, the approval for your warehouse will be for a 3-year period, subject to you maintaining the eligibility conditions in paragraph 6.2 and fulfilling the responsibilities in paragraph 10.
- 8.2 Upon approval, your business name, GST registration number, Zero-GST/ Licensed Warehouse license number, address of your warehouse and effective date of approval under SWS will be published on IRAS' website. This is to allow other GST-registered businesses to check the approval status of your warehouse so as to zero-rate their supplies of services.
- 8.3 Before the expiry of the 3-year period, you will also be required to complete and submit a certified "Assisted Self-Help Kit (ASK): Declaration Form on Completing Annual Review & Voluntary Disclosure of Errors" (Section 3 of ASK) in order to assess your eligibility to remain under the scheme.

9 Conditions of Approval

- 9.1 Apart from the eligibility conditions in paragraph 6.2, the Comptroller may also impose additional conditions in the approval of individual cases. These conditions will need to be maintained for you to remain in the scheme. Should you fail to comply with any of the conditions, you must immediately inform the Comptroller of GST, so that the Comptroller may determine if the SWS approval status for your warehouse should be revoked.
- 9.2 You must also account for and pay GST¹³ at the prevailing GST rate on all supplies, relating to goods stored in your warehouse, which take place after you fail to comply with the conditions and cannot come within the zero-rating relief of this scheme (described in paragraphs 12 and 13 of this guide). Please note that, apart from accounting for GST on your own supplies, you must also account for GST on supplies of qualifying services that were zero-rated by other GST-registered businesses.
- 9.3 However, this liability to account for GST will stop once any of the following events occurs:
- (a) The SWS approval status granted for your warehouse ends (i.e. no longer an Approved Specialised Warehouse). For example, the Comptroller of GST revokes the SWS approval, you voluntarily exit from SWS, or the validity period of the SWS approval lapses.

Once the SWS approval status granted ends, the supplies relating to goods stored in your warehouse will no longer qualify for the zero-rating relief described in this guide.
 - (b) You are able to comply with the conditions again.
 - (c) The Comptroller of GST informs you that the warehouse can continue to be an Approved Specialised Warehouse.

¹³ The GST amount should be reported in Box 6 ("Output tax due") of your GST return.

Example 1

Co A is the operator of an Approved Specialised Warehouse. One of the conditions of approval is that more than 90% of the total customers who store goods in the warehouse must be overseas customers. However, on 1 Jan 2022, only 20% of Co A's customers who store goods in the warehouse are overseas customers.

- Co A should immediately inform the Comptroller of GST of its failure to comply with a condition of approval.
- If Co A makes a supply relating to goods stored in the warehouse on or after 1 Jan 2022, it cannot zero-rate the supply based on the relief described in this guide. It needs to account for output tax on the supply.
- If an auctioneer (i.e. another GST-registered business) makes a supply relating to goods stored in the warehouse on or after 1 Jan 2022, and the supply is zero-rated based on the relief described in this guide, Co A also needs to account for output tax on the supply made by the auctioneer. However, if the auctioneer decides to standard-rate the supply or if the supply can qualify for other zero-rating relief, Co A does not need to account for GST on that supply.

Example 2

After being informed about the failure to comply, the Comptroller revokes the approval granted to the warehouse on 15 Jan 2022.

- From 15 Jan 2022, the supplies made by both Co A and the auctioneer must be standard-rated, unless they qualify for other zero-rating relief.
- Without checking the warehouse's status, the auctioneer may erroneously continue to zero-rate his supply based on the relief described in this guide. If so, Co A is not liable to account for GST on the supply zero-rated by the auctioneer.

10 Responsibilities under the Scheme

For the avoidance of doubt, the conditions and/or requirements in paragraphs 10.2 to 10.5 and Appendix B have the force of law.

You have the following responsibilities under SWS:

- 10.1 You must immediately inform the Comptroller of GST of any change in the particulars or information declared in your application (e.g. change in license number, license type or address of Zero-GST/ Licensed Warehouse).
- 10.2 You must maintain records of your customers (both existing and former) with details of their belonging status and period which you are contracted to provide storage facilities. If your overseas customer is not the owner of the

goods stored, you must ensure that your zero-rated supplies to the overseas customer under SWS do not directly benefit any non-GST registered person in Singapore. Please refer to paragraph 12.1 on the conditions for zero-rating.

- 10.3 You must maintain records of all qualifying goods removed from the warehouse with details of the number of units and whether they are for export.
- 10.4 As other GST-registered businesses may rely on the approval of your warehouse to zero-rate their supplies of services, you may need to acknowledge on service reports or provide written confirmation that services are performed on qualifying goods stored in your warehouse. These serve as supporting documents for the zero-rated supplies made by the GST-registered businesses. You may refer to [Appendix B](#) for a template of written confirmation.
- 10.5 You must maintain a listing of supplies related to goods stored in your warehouse and zero-rated under the relief described in paragraphs 12 and 13 of this guide, including services which are performed during the period covered by Temporary Import Scheme¹⁴. The services may be supplied by you or other GST-registered businesses. In addition to maintaining records of your supplies, you need to maintain records of such services supplied by other GST-registered businesses¹⁵. The listing must contain the following details:
- (a) Supplier's name;
 - (b) Supplier's GST registration number;
 - (c) Time of supply¹⁶;
 - (d) Description of the supply; and
 - (e) Value of supply.

The listing also allows you to determine the amount of output tax to account for in the event you fail to comply with the conditions of approval.

¹⁴ The Temporary Import Scheme allows the suspension of GST and/or duty when goods are removed from the Zero-GST/Licensed Warehouse and are temporarily imported for approved purposes (e.g. for repair, exhibitions, fairs or other similar events). For more information, please refer to Singapore Customs' webpage on [Temporary Import Scheme](#) or approach your Account Manager in Singapore Customs.

For zero-rating to apply under SWS on prescribed services performed on prescribed goods temporarily removed from the Approved Specialised Warehouse, the goods must be returned to any Approved Specialised Warehouse after the event. Please refer to paragraph 12.1 for more information.

¹⁵ Such information may be obtained from other GST-registered businesses when they request for your acknowledgement or written confirmation that services are performed on prescribed goods stored in the warehouse.

¹⁶ Time of supply is the earlier of the date the supplier issues an invoice, or the date the supplier receives payment.

11 Revocation of Approval

For the avoidance of doubt, the conditions and/or requirements in paragraph 11.1 have the force of law.

- 11.1 Approval is granted on the condition that the warehouse must continue to be a Zero-GST/ Licensed Warehouse during the 3-year validity period under SWS. Please inform the Comptroller of GST early if you decide not to renew your Zero-GST/ Licensed Warehouse license after it expires. In the event that the Zero-GST/ Licensed Warehouse license is not renewed or is revoked, approval for the warehouse under SWS will also be revoked.
- 11.2 The Comptroller of GST may also, by notice in writing, revoke the approval if it is found that you have:
- (a) At any time, ceased to satisfy any of the eligibility requirement for SWS; or
 - (b) Provided false, misleading or inaccurate information in the application for SWS; or
 - (c) Failed to comply with any condition of approval and responsibilities under SWS.
- 11.3 After revocation of approval, you should not make representations (e.g. written confirmation to other GST-registered businesses) that the warehouse is an Approved Specialised Warehouse. If you are aware of any GST-registered businesses that may wrongfully rely on their past knowledge of the approval to zero-rate their supplies, you should immediately inform them of the revocation and that supplies of services performed on goods stored in the warehouse can no longer qualify for zero-rating.

12 Zero-rating of the Supply of Storage and Other Services

- 12.1 A GST-registered business, including the operator of the Approved Specialised Warehouse, may zero-rate a supply of service that satisfies the following conditions:
- (a) The service is supplied under a contract with an **overseas person** and directly benefits an **overseas person**¹⁷.

With effect from **1 Jan 2020**, zero-rating is extended to services supplied under a contract with an **overseas person** and directly benefiting a **GST-registered person in Singapore**;

You will have to standard-rate the part of your services that directly benefits local *non-GST registered* persons. If you are unable to

¹⁷ If the person is an individual, he shall generally be treated as belonging overseas if his residential address is not in Singapore. If the person is a business (e.g. company), it shall generally be treated as belonging overseas if it does not have any business establishment or fixed establishment in Singapore.

determine the portion of services that directly benefits local non-GST registered persons, you will have to charge GST on your entire supply of services to your overseas customer.

- (b) The service is a **prescribed service** (refer to paragraph 12.3);
- (c) The service is supplied directly in connection with **prescribed goods** (refer to paragraph 5); and
- (d) At the time the service is performed, the prescribed goods –
 - are stored in an Approved Specialised Warehouse; or
 - have been removed from an Approved Specialised Warehouse under the Temporary Import Scheme for the following purposes:
 - (i) for the repair, maintenance or performance of any other similar service on the goods; or
 - (ii) for an auction, exhibition or other similar event involving the display of goods.

After this activity or event, the prescribed goods must be returned to any Approved Specialised Warehouse.

- 12.2 Details of Approved Specialised Warehouses will be published on IRAS' website. You, as a supplier of the service, should check the published details and with the operator of the Approved Specialised Warehouse on whether conditions (c) and (d) are satisfied before zero-rating your supply of service.

Prescribed Services

12.3 The qualifying services are:

- (a) storage services;
- (b) goods management services;
- (c) services in connection with the holding of an auction, exhibition or other similar event involving the display of goods;
- (d) broking services and other similar services;
- (e) conservation and restoration services;
- (f) valuation services; and
- (g) insurance services.

The services must be directly in connection with the prescribed goods.

Example 3

Co A operates a Zero-GST Warehouse which is used for its business of storing works of art. Co A applied for SWS and the Zero-GST Warehouse is approved as an Approved Specialised Warehouse.

John is an **overseas person**. Co A supplies storage and management services (*prescribed services*) to John for a painting (*prescribed goods*) that is stored in its Approved Specialised Warehouse.

- Co A may zero-rate its supply of storage and management services to John.

Example 4

Co A operates an Approved Specialised Warehouse. Co B (*a supplier other than the warehouse operator*) supplies auction service (*a prescribed service*) to John for the painting (*prescribed goods*). The painting is removed from Co A's Approved Specialised Warehouse for an auction under the Temporary Import Scheme, and is returned to the Approved Specialised Warehouse after the auction.

- Co B may zero-rate its supply of auction service to John who is an overseas person.

Co A and Co B also supply the same services to Lee who is a **local person and not GST-registered**.

- Co A and Co B should standard-rate their supplies of services to Lee unless the supplies qualify for other zero-rating relief.

Example 5

Co A operates an Approved Specialised Warehouse. John is an **overseas person**.

Co A is contracted by John to supply storage and management services (*prescribed services*) for a painting (*prescribed goods*) that is stored in its Approved Specialised Warehouse. The painting belongs to Co C which is a local GST-registered company.

- With effect from 1 Jan 2020, Co A may zero-rate its supply of storage and management services to John that directly benefit Co C, **a local GST-registered company**. However, Co C will be required to apply reverse charge on imported services if it is not entitled to full input tax recovery, and this will include any amounts charged to it by John for the services provided.

Documentary Requirements

12.4 You are required to maintain all documents to support zero-rating. They include:

- (a) Service request or contract with your overseas customer (if applicable).
- (b) Invoice to your overseas customer.
- (c) Evidence of payment received from your overseas customer.
- (d) A copy of the letter of approval for SWS. You may need to obtain it from the operator of the Approved Specialised Warehouse.
- (e) Document(s) validating that –
 - the service is performed on qualifying goods; and
 - at the time the service is performed, the qualifying goods are stored in or were removed (under Temporary Import Scheme) from an Approved Specialised Warehouse.

If you are the operator of the Approved Specialised Warehouse, such a document may be in the form of your contract with the overseas customer described in (a). For suppliers other than the operator, such a document may be in the form of a service report acknowledged by the operator, or a written confirmation from the operator. Please refer to [Appendix B](#) for a template of written confirmation.

12.5 Where the service is performed during the period covered by Temporary Import Scheme, you also must maintain the following documents:

- (a) A copy of the relevant permit/ declaration letter taken to remove the qualifying goods from an Approved Specialised Warehouse to the event venue; and
- (b) A copy of the relevant permit/ declaration letter taken to return the qualifying goods from the event venue to the same or another Approved Specialised Warehouse.

12.6 If the permits/ declaration letters are taken by the operator of the Approved Specialised Warehouse, other suppliers will need to obtain a copy of these documents from the operator to support their zero-rated supply.

13 Zero-rating of the Supply of Storage Space

- 13.1 The spectrum of storage facilities provided for high-value goods kept in an Approved Specialised Warehouse may range from “managed storage service”¹⁸ to “private storage unit”¹⁹. For GST purposes, a provision of “managed storage service” is likely to be regarded as a supply of service, but a provision of “private storage unit” is likely to be regarded as a supply of lease/ tenancy/ licence to occupy land. Prior to 1 Oct 2011, the supply of lease/ tenancy/ licence to occupy land must be standard-rated as the land is located in Singapore.
- 13.2 To allow zero-rating to the entire spectrum of storage facilities, the operator of an Approved Specialised Warehouse (i.e. the business that applied for SWS) may zero-rate both the supply of storage as a service and the supply of lease/ tenancy/ licence to occupy land that satisfies the following conditions:
- (a) The lease/ tenancy/ licence to occupy land is supplied under a contract with an **overseas person** and directly benefits an **overseas person**²⁰;
 - (b) The whole land is part of the Approved Specialised Warehouse; and
 - (c) The land is used by the operator of the Approved Specialised Warehouse in its business of storing qualifying goods for others.

In other words, the operator must be engaged by its overseas customer for storing of goods, and not for other purposes. Therefore, the provision of “private storage unit” qualifies for zero-rating, so long as the qualifying goods stored within are not the operator’s own goods. However, if the operator leases land for its customer to set up an office, the supply cannot be zero-rated.

- 13.3 While all GST-registered businesses may zero-rate the supply of storage as a service (subject to the conditions in paragraph 12.1), only the operator of an Approved Specialised Warehouse can zero-rate a supply of lease/ tenancy/ licence to occupy a storage space in his warehouse.

¹⁸ Under this model, the storage supplier stores its customer’s goods in an area not specifically allocated for the goods but together with the goods of other customers. All the goods are managed by the storage supplier.

¹⁹ Under this model, the storage supplier allocates a defined area (e.g. vault, locker) in its warehouse to store its customer’s goods. The storage supplier may additionally supply other services such as management service for the goods.

²⁰ If the person is an individual, he shall be treated as belonging overseas if his residential address is not in Singapore. If the person is a business (e.g. company), it shall be treated as belonging overseas if it does not have any business establishment or fixed establishment in Singapore.

Example 6

John is an **overseas person**. He engaged Co A, which operates an Approved Specialised Warehouse, to store antiques (*prescribed goods*) in a 25m² storage unit. The storage unit is exclusively for John's use.

- Co A may zero-rate its supply of storage unit to John.

Co A also supplies a similar storage unit to Lee who is a **local person**.

- Co A should standard-rate its supply of storage units to Lee.

Example 7

Co A operates an Approved Specialised Warehouse. Bank D engaged Co A to store investment-grade gold (*prescribed goods*) in a 100m² storage unit. The storage unit is exclusively for Bank D's use.

- If Bank D is an **overseas company**, Co A may zero-rate its supply of private storage unit to Bank D.
- If Bank D is a **local company**, Co A should standard-rate its supply of private storage unit to Bank D.

As some of the investment-grade gold which Bank D stored is owned by Bank D's customers, Bank D also supplies storage service (*a prescribed service*) to its customers.

- If Bank D is GST-registered in Singapore, Bank D may zero-rate its supply of storage service to the customers belonging outside Singapore (explained in paragraph 12). The supply of storage service to customers belonging in Singapore should be standard-rated, unless the supply qualifies for other zero-rating relief.

Documentary Requirements

13.4 You are required to maintain all documents to support zero-rating. They include:

- (a) Contract with your overseas customer (if applicable)
- (b) Invoice to your overseas customer
- (c) Evidence of payment received from your overseas customer

14 Contact Information

14.1 For enquiries on this e-Tax Guide, please contact:

Goods & Services Tax Division
Inland Revenue Authority of Singapore
55 Newton Road
Singapore 307987

Tel: 1800 356 8633

Email: gst@iras.gov.sg

14.2 If you wish to enquire about Zero-GST/ Licensed Warehouse, Temporary Import Scheme and permits declaration matters, please contact:

Singapore Customs
55 Newton Road
Singapore 307987

Website: www.customs.gov.sg

Tel: (+65) 6355 2000

15 Updates and Amendments

	Date of amendment	Amendments made
1	1 Apr 2015	<p>Revised paragraph 6.2.1(c) to (f) and footnote 5 in line with the legislative changes on Regulation 106B taking effect from 1 Apr 2015.</p> <p>Amended Example 1 in paragraph 6.5.2 and paragraph 6.6.2.</p>
2	11 Oct 2019	<p>Revised paragraph 2.3, inserted paragraph 3.3, revised paragraph 7.1(c) and 12.1(a), added Example 4 and 5 to reflect legislative changes arising from reverse charge taking effect from 1 Jan 2020.</p> <p>Added paragraph 6.2(i), 7.1(c) and 8.2 on the requirement to perform ASK Annual Review or commit to participate in ACAP in order to apply and remain under the scheme.</p> <p>Other editorial amendments.</p>
3	1 Mar 2021	<p>Updated change in name of Singapore Institute of Accredited Tax Professionals (SIATP) to Singapore Chartered Tax Professionals Limited (SCTP).</p>
4	1 Jan 2023	<p>Revised paragraph 4.2 on Zero-GST Warehouse Scheme and Licensed Warehouse Scheme.</p> <p>Amended paragraph 9.2 on the prevailing GST rate.</p> <p>Other editorial amendments.</p>
5	30 Jan 2026	<p>Editorial changes</p>

Appendix A: Definition of prescribed goods

- (a) **“Work of art”** means a work or an object of artistic interest, in any material or form contained in any medium, including –
- a painting, drawing, collage, decorative plaque or similar picture;
 - an engraving, lithograph or other print;
 - a sculpture or statuary, in any material;
 - a sculpture cast;
 - a tapestry or other hanging;
 - a ceramic;
 - an enamel on metal;
 - a film²¹;
 - a photograph;
 - a sound recording²²; and
 - an installation.

The work or object must not be produced for mass commercial sale, and is the only such work of art or is comprised in a limited edition.

- (b) **“Antique”** means an object that is more than 100 years old.
- (c) **“Artefact”** means an object of historical or cultural interest.
- (d) **“Collector’s item”** means any collection or collector’s piece, that is of zoological²³, botanical²⁴, mineralogical²⁵, anatomical²⁶, historical²⁷, archaeological²⁸, palaeontological²⁹, ethnographic³⁰, numismatic³¹ or philatelic interest.

For the purpose of SWS and the zero-rating relief explained in this guide, a collector’s piece is of *philatelic interest* if —

²¹ A video recording, cinematographic film or any other aggregate of visual images embodied in digital format, disc, tape, film or other device in which visual images are embodied.

²² The aggregate of the sounds embodied in digital format, disc, tape, film or other device in which sounds are embodied.

²³ An interest connected with the scientific study of animals and their behaviour.

²⁴ An interest connected with the scientific study of plants and their structure.

²⁵ An interest connected with the scientific study of minerals.

²⁶ An interest connected with the scientific study of the structure of human or animal bodies.

²⁷ An interest connected with the study of past events concerned in the development of a particular place, subject, etc.

²⁸ An interest connected with the study of cultures of the past, and of periods of history by examining the remains of buildings and objects found in the ground.

²⁹ An interest connected with the study of fossils as a guide to the history of life on earth.

³⁰ An interest connected with the study of different races and cultures.

³¹ An interest connected with the study of coins and medals.

- (i) it is a postage or revenue stamp, a postmark, a first-day cover or an item of pre-stamped stationery; and
 - (ii) it is franked, or (if unfranked) it is not legal tender and is not intended for use as such.
- (e) “**Precious metal**” means gold, silver, palladium or platinum of a purity not less than 995 thousandths. They must be in the form of a bar or wafer, of a weight accepted by a bullion or commodity market or exchange.
- (f) “**Precious stone**” means a diamond, a ruby, a sapphire or an emerald.
- (g) “**Jewellery**” means any object designed for the adornment of the body (e.g. a necklace, a ring, a bracelet, an earring, or a brooch). It must comprise any one or more of the following:
 - (i) a precious metal
 - (ii) a precious or semi-precious stone
 - (iii) an organic substance such as pearl, coral or amber
- (h) “**Wine**” means an alcoholic beverage falling under the following Harmonised System Headings:

Harmonised System Heading	Product Description
2204.10.00	Sparkling wines
2204.21.11	Still wine; In container holding 2 Litres or less; of alcoholic strength by volume not exceeding 15% vol
2204.21.12	Still wine; In container holding 2 Litres or less; of alcoholic strength by volume exceeding 15% vol
2204.29.11	Other wine; In container holding more than 2 Litres; of alcoholic strength by volume not exceeding 15% vol
2204.29.12	Other wine; In container holding more than 2 Litres; of alcoholic strength by volume exceeding 15% vol
2204.21.21	Grape must, with fermentation prevented or arrested by the addition of alcohol, including fortified wine, 2ltr or less, not exceeding 15% alc/vol
2204.21.22	Grape must, with fermentation prevented or arrested by the addition of alcohol, including fortified wine, 2ltr or less, exceeding 15% alc/vol
2204.29.21	Grape must, with fermentation prevented or arrested by the addition of alcohol, including fortified wine, more than 2 ltr, not exceeding 15% alc/vol
2204.29.22	Grape must with fermentation prevented or arrested by the addition of alcohol, in containers holding more than 2 litre, of an alcoholic strength by volume exceeding 15% vol
2204.30.10	Other grape must, not exceeding 15% alc/vol
2204.30.20	Other grape must, exceeding 15% alc/vol
2205.10.10	Vermouth and other grape wine flavoured with plants or aromatic substances, 2 ltr or less, not exceeding 15% alc/vol
2205.10.20	Vermouth and other grape wine flavoured with plants or aromatic substances, 2 ltr or less, exceeding 15% alc/vol
2205.90.10	Vermouth and other grape wine flavoured with plants or aromatic substances, more than 2 ltr, not exceeding 15% alc/vol
2205.90.20	Vermouth and other grape wine flavoured with plants or aromatic substances, more than 2 ltr, exceeding 15% alc/vol
2206.00.10	Cider & Perry
2206.00.90	Mead and other fermented beverages and mixtures of fermented beverages and non-alcoholic beverages

Appendix B: Template of written confirmation

For the avoidance of doubt, the conditions and/or requirements in Appendix B have the force of law.

<Reference Number>

Date: <dd mmm yyyy>

To: <Name of supplier>

<GST registration number of supplier>

<Address of supplier>

Confirmation of Service(s) Performed

We hereby confirm that <name of supplier> has performed the service(s) in Part A on the goods in Part B on <date of performance>.

Part A

S/N	Description of Service	Remarks
1		
2		

Part B

S/N	Description of Goods	Identification Number
1		
2		

At the time the service(s) is(are) performed: *[Please select]*

- ☐ The goods in Part B are stored in a Zero-GST Warehouse/ Licensed Warehouse (<warehouse licence number>) approved under the Specialised Warehouse Scheme.
- ☐ The goods in Part B were temporarily removed from a Zero-GST/ Licensed Warehouse (<warehouse licence number>) approved under the Specialised Warehouse Scheme, with the permission of Singapore Customs, for <name of event> held at <event venue> for the period of <state period>. After the event, all the goods in Part B will be returned to a Zero-GST/ Licensed Warehouse (<warehouse licence number>) approved under the Specialised Warehouse Scheme.

Yours faithfully

Name of Authorised Personnel³²:

Designation:

Business Name of Zero-GST/ Licensed Warehouse Operator:

³² Authorised personnel should be a person holding at least the appointment of Manager/ Head of Department.

GST Registration Number:

Warehouse Licence Number:

Company Stamp and Signature: