

GST – Supplies by New Zealand taxidermists to overseas hunters and New Zealand outfitters



Introduction

1. Overseas hunters who participate in guided big game hunting experiences in New Zealand often acquire souvenir animal parts that they want sent to their home overseas.
2. Souvenir animal parts must, for biosecurity reasons, be expedited or mounted before being exported overseas. Therefore, usually, an overseas hunter or their New Zealand outfitter will engage a taxidermist to carry out the necessary taxidermy work on their souvenir animal parts.
3. A taxidermist who is or should be registered for GST must add GST to the price of their taxidermy work. GST will be added at either the standard-rate (15%) or the zero-rate (0%).

What are souvenir animal parts?

“Souvenir animal parts” refer to the parts of a trophy hunting animal killed by a hunter (for example, heads, shoulders, skins, antlers or bodies) that may later be expedited or mounted.

Taxidermy is the supply of a service

4. When a taxidermist works on souvenir animal parts owned by the hunter or the outfitter, the taxidermist is supplying services for GST purposes. Ownership in the souvenir animal parts is not usually transferred to the taxidermist when the parts are delivered to be worked on. The customer expects their souvenir animal parts to be returned to them as hunting souvenirs.
5. Any taxidermy materials supplied along with a taxidermist's services are ancillary to the supply of services. Therefore, a taxidermist is not making a supply of goods for GST purposes when working on souvenir animal parts owned by the hunter or the outfitter.

What are hunting souvenirs?

“Hunting souvenirs” refer to the souvenir animal parts once they have been expedited or mounted by a taxidermist.

Supply of taxidermy services to an outfitter

6. Where a taxidermist is engaged by an outfitter to perform taxidermy services on souvenir animal parts GST must be added to the price of the taxidermy work at the standard rate of 15%. This is because the taxidermist is making a supply of services in New Zealand on personal property situated in New Zealand.

Supply of taxidermy services to an overseas hunter

7. Where a taxidermist is engaged by an overseas hunter to perform taxidermy services on souvenir animal parts, the rate of GST to be added to the price of the taxidermy work depends on the agreements.
8. A taxidermist can only zero-rate the supply of their taxidermy services to an overseas hunter when:

- the overseas hunter is not in New Zealand at the time the taxidermy services are performed; and
 - the outfitter has agreed with the overseas hunter to supply and enter for export the souvenir animal parts "in the course of, or as a condition of," the outfitter's supply of those parts; and
 - the outfitter will export those souvenir animal parts within the time applied for by the outfitter and allowed by Inland Revenue.
9. A taxidermist may be appointed to act as the agent of an outfitter in entering souvenir animal parts or hunting souvenirs for export. However, even when acting as the outfitter's agent, the taxidermy services can only be zero-rated where the three conditions in [8] are met.
10. Any taxidermy services supplied to an overseas hunter, where the three conditions in [8] are not met, must be standard-rated. This is because the taxidermist is making a supply of services in New Zealand on personal property situated in New Zealand.

Supply of a hunting souvenir

11. Where a hunting souvenir is sold by a taxidermist using souvenir animal parts they own, they are making a supply of goods.
12. A taxidermist can zero-rate such a supply of goods where they agree to export the hunting souvenir "in the course of, or as a condition of the supply". However, the hunting souvenir must be exported to the overseas purchaser within either 28 days of the time of supply or the time applied for by the taxidermist and allowed by Inland Revenue.
13. An application can be made for an extension for either a single supply of goods before the 28-day period expires or for multiple supplies of a class of goods. An application, along with relevant supporting documents, should be emailed to GSTexportextensions@ird.govt.nz.

Packing and crating services

14. Packing and crating services are only zero-rated when a taxidermist is either making a zero-rated supply of taxidermy services to an overseas hunter or is selling and exporting a hunting souvenir to an overseas customer.
15. All other packing and crating services must be standard-rated.

Where to get more information

For more information on GST and the hunting industry, see:

- the other two factsheets in this series (prepared for New Zealand hunting outfitters and overseas hunters in New Zealand) - *IS 20/02 FS 1* and *IS 20/02 FS 3*
- *Interpretation Statement IS 20/02 Goods and Services Tax – Supplies by New Zealand hunting outfitters and taxidermists to overseas hunters.*
- *Commissioner's Statement CS 20/02 Trophy hunting and the GST treatment of the "Trophy Fee"*

These documents are available from our website taxtechnical.ird.govt.nz