Republic of the Philippines
PHILIPPINE ECONOMIC ZONE AUTHORITY

MEMORANDUM CIRCULAR NO. 2025-051

TO : **ALL CONCERNED REGISTERED BUSINESS ENTERPRISES (RBEs)**
ALL ZONE ADMINISTRATORS/ZONE MANAGERS/OFFICERS-IN-CHARGE

FROM : **VIVIAN S. SANTOS**
Officer-in-Charge of the Authority
and Deputy Director General for Operations

DATE : **23 September 2025**

SUBJECT : **FIRB Advisory 007-2025**

Please be informed that the Fiscal Incentives Review Board (FIRB) issued FIRB Advisory 007-2025 on the Prescribed Certificate of Entitlement to Tax Incentives Template for Transitory, New, and Expansion Projects under Republic Act No. 12066 or the Corporate Recovery and Tax Incentives for Enterprises to Maximize Opportunities for Reinvigorating the Economy (CREATE MORE) Act.

The following revised templates of the CETI are prescribed:

- Template 1 (Annex A) – For projects registered under RA No. 11534 or the Corporate Recovery and Tax Incentives for Enterprises (CREATE), and RA No. 12066
- Template 2 (Annex B) – For transitory projects or projects registered prior to the effectivity of RA No. 11534.

Attached hereto are the FIRB Advisory and revised CETI templates for reference.

For your information and guidance.

JBE/LJF/gdt

REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF FINANCE
FISCAL INCENTIVES REVIEW BOARD
MANILA

BAGONG PILIPINAS

FIRB Advisory 007-2025

FOR	:	**All Investment Promotion Agencies (IPAs), Registered Business Enterprises (RBEs), and all other key stakeholders**
SUBJECT	:	**Prescribed Certificate of Entitlement to Tax Incentives Template for Transitory, New, and Expansion Projects under Republic Act No. 12066 or the Corporate Recovery and Tax Incentives for Enterprises to Maximize Opportunities for Reinvigorating the Economy (CREATE MORE) Act**
DATE	:	03 September 2025

This Advisory issues the prescribed revised format of the Certificate of Entitlement to Tax Incentives (CETI) in accordance with the provisions of Republic Act (RA) Nos. 11534, and 12066, and its Implementing Rules and Regulations.

The following revised templates of the CETI are prescribed:

- **Template 1 (Annex A) -** For projects registered under RA No. 11534 or the Corporate Recovery and Tax Incentives for Enterprises (CREATE), and RA No. 12066; and

- **Template 2 (Annex B) -** For transitory projects or projects registered prior to the effectivity of RA No. 11534.

The IPAs must sign and affix their official seal to the CETI for all transitory, CREATE, and CREATE MORE projects.

The prescribed revised format of the CETIs should include all the required information as specified in **Annex C**. It shall be the primary responsibility of IPAs to ensure the accuracy and correctness of the data.

The CETI template shall also be made available in the Fiscal Incentives Registration and Monitoring System (FIRMS). IPAs that do not use FIRMS can upload the signed CETIs to their own systems or distribute them using their preferred method.

For information and strict compliance.

DAKILA ELTEEN M. NAPAO
Assistant Secretary of Finance
Head of the FIRB Secretariat

Annex A
Template of CETI for CREATE and CREATE MORE Projects

Certification Number: {20XX-IPA-XXXXX}

CERTIFICATE OF ENTITLEMENT TO TAX INCENTIVES
For Taxable Year ending MONTH-DAY-YEAR

This is to certify that the {BusinessEnterpriseName}, with business address {BusinessEnterpriseMainOfficeAddress}, is registered with the {IPA}, pursuant to Title XIII of the National Internal Revenue Code of 1997, as amended by Republic Act (RA) No. 11534 and RA No. 12066:

Registration Date	**{DateOfRegistration}**
Certificate of Registration No.	**{CORNumber}**
Tax Identification Number	**{TaxIdentificationNumber}**
Registered Project / Activity	**{ActivityProjectNameOrDescription}**
Actual Start of Commercial Operation	**{ActualStartOfCommercialOperations}**
Incentives and Actual Period of Entitlement:	
Income Tax Holiday	**{ITHStart} to {ITHEnd}**
5% Special Corporate Income Tax	**{SCITStart} to {SCITEnd}**
Enhanced Deductions Regime:	**{EDStart} to {EDEnd}**

subject to the representation and commitments set forth in its application for registration, the provisions of the above laws, the rules and regulations promulgated thereunder, and the terms and conditions of the Certificate of Registration.

This Certificate is issued pursuant to the Implementing Rules and Regulations of RA No. 12066, requiring the submission of the Certificate of Entitlement to Tax Incentives upon the filing of the annual income tax return with the Bureau of Internal Revenue.

*Further, this Certificate is issued without prejudice to the evaluation of the full compliance by the registered business enterprise with its Terms and Conditions prior to tax incentives availment and shall be valid for the taxable year ending **{MONTH-DAY-YEAR}** unless canceled, suspended, or withdrawn by the {IPA} or the Fiscal Incentives Review Board (FIRB), after due process.*

Furthermore, this Certification shall be deemed revoked upon written notice to that effect as may be issued by the {IPA} or FIRB, after due process.

SEAL OF IPA

In testimony whereof, the seal of the {IPA} and the signature of its designated authority are hereunto affixed. Given in {PlaceGrantedTheCertificate}, PHILIPPINES on {DateGrantedTheCertificate}.

{IPADesignatedAuthorityName}
{Designation}

Attested by:

{Attestation}
{Designation2}

Annex B
Template of CETI for Pre-CREATE or Transitory Projects

Certification Number: {20XX-IPA-XXXXX}

CERTIFICATE OF ENTITLEMENT TO TAX INCENTIVES
For Taxable Year ending MONTH-DAY-YEAR

This is to certify that the {BusinessEnterpriseName}, with business address {BusinessEnterpriseMainOfficeAddress}, is registered with the {IPA}, pursuant to {IPA_Charter} and Title XIII of the National Internal Revenue Code of 1997, as amended by Republic Act (RA) No. 11534 and RA No. 12066:

Registration Date	**{DateOfRegistration}**
Registration Agreement/Certificate of Registration/other equivalent document No.	**{CORNumber, *or its equivalent, as applicable*}**
Tax Identification Number	**{TaxIdentificationNumber}**
Registered Project / Activity	**{ActivityProjectNameOrDescription}**
Actual Start of Commercial Operation	**{ActualStartOfCommercialOperations}**
Incentives and Actual period of entitlement:	
Income Tax Holiday	**{ITHStart} to {ITHEnd}**
5% Tax on Gross Income Earned	**{GIEStart} to {GIEEnd}**
Others, Specify: {OtherIncentives}	**{OthersStart} to {OthersEnd}**

subject to the representation and commitments set forth in its application for registration, the provisions of the above laws, the rules and regulations promulgated thereunder, and the terms and conditions of the Registration Agreement, Certificate of Registration, or other equivalent document, as applicable.

This Certificate is issued pursuant to the Implementing Rules and Regulations of RA No. 12066, requiring the submission of a Certificate of Entitlement to Tax Incentives upon the filing of the annual income tax return with the Bureau of Internal Revenue.

*Further, this Certificate is issued without prejudice to the evaluation of the full compliance by the registered business enterprise with its Terms and Conditions prior to tax incentives availment and shall be valid for the taxable year ending **{MONTH-DAY-YEAR}** unless canceled, suspended, or withdrawn by the {IPA} or the Fiscal Incentives Review Board (FIRB), after due process.*

Furthermore, this Certification shall be deemed revoked upon written notice to that effect as may be issued by the {IPA} or the FIRB, after due process.

SEAL OF IPA

In testimony whereof, the seal of the {IPA} and the signature of its designated authority are hereunto affixed. Given in {PlaceGrantedTheCertificate}, PHILIPPINES on {DateGrantedTheCertificate}.

{IPADesignatedAuthorityName}
{Designation}

Attested by:

{Attestation}
{Designation2}

Annex C
Required CETI Data for Pre-CREATE and CREATE MORE Projects

Data Field	Description
Business Enterprise Name	The name of the registered business enterprise as specified in the ATO or other equivalent document.
RBE Main Office Address	The main office address of the business enterprise
IPA Name	The name of the IPA in which the project/activity is registered
CETI Certification Number	The reference number to be indicated in the project's CETI
IPA Registration Date	The date when the project was registered
Certificate of Registration (COR) Number	The COR number as indicated in the RBE's COR or its equivalent for pre-CREATE projects
Taxpayer Identification Number (TIN)	The 14-digit code, including the 5-digit branch code, as specified in the RBE's BIR registration (BIR Form No. 2303)
Registered Project/Activity Name	The name of the registered project/activity as specified in the ATO
Actual Start of Commercial Operation (SCO)	The date of the actual SCO of the project/activity
Income Tax Holiday (ITH)	Indicate the start and end dates of the ITH period, as applicable
Place of Issuance	Place where the CETI is issued
Date of Issuance	Date when the CETI is issued
IPA Designated Authority Name	The name of the designated authority of the concerned IPA
Attesting Officer	The name of the attesting officer

Designation	The designation of the IPA designated authority and attesting officer
Specific data fields for Pre-CREATE Projects	
IPA Charter	Charter of the concerned IPA
5% Gross Income Earned (GIE)	Indicate the start and end dates of the GIE period, which should not be later than 31 December 2034
Others	Specify the other types of income tax-based incentives granted, and indicate the corresponding start and end dates of each incentive
Specific data fields for CREATE MORE Projects	
5% Special Corporate Income Tax (SCIT)	Indicate the start and end dates of the SCIT period
Enhanced Deductions Regime (EDR)	List of ED/s availed by the RBE, with start and end dates of the ED period