International Tax Review

Current information on international tax developments provided by EY Austria

International Tax Developments

OECD Developments

- The Latest on BEPS – 1 February 2016
- The Latest on BEPS – 18 January 2016
- Thirty-one countries sign tax cooperation agreement enabling automatic sharing of country-by-country reporting information

EU Developments

- EU Anti-Tax Avoidance Directive has implications for banking, insurance and asset management sectors
- United States Treasury Secretary voices concerns regarding State Aid investigations
- European Commission releases anti-tax avoidance package designed to provide uniform implementation of BEPS measures and minimum standards across Member States
Country Updates

Canada
- Canada: New Brunswick issues budget 2016-17
- Four reasons why you shouldn't put off the succession planning conversation
- Check out our helpful online tax calculators and rates
- Beneficiary of low interest rates – the federal government
- BEPS requires rigor around documentation and structure supporting cross-border employment activity
- Unwarranted large personal tax refunds: wilfully blind and grossly negligent

Cape Verde
- Cape Verde issues new transfer pricing documentation requirements
- Cape Verde implements 2016 tax changes

Chile
- Chile’s Congress approves bill simplifying income tax system
- Chile’s Law to simplify income tax system enters into force

Colombia
- Oil, Gas and Mining Bulletin: January 2016

Congo
- Congo issues 2016 Financial Law

Costa Rica
- Costa Rican Congress approves Double Taxation Treaty with Germany

Ecuador
- Ecuador establishes requirements for completing shareholders’ annex

Ghana
- Ghana enacts income tax amendments

Guatemala
- Guatemala publishes annex to the income tax return on related parties
- Guatemala’s tax credits for VAT generated in 2012 expire in 2016
Country Updates

- Guatemala proposes bill modifying tax incentive regimes  
- Honduras extends deadline for filing Annual Transfer Pricing Informative return  
- Honduras enacts new tax amnesty program  
- Honduras extends deadline for filing Annual Transfer Pricing Informative return  
- Honduras enacts new tax amnesty program  
- Hong Kong and Russia sign income tax treaty  
- Hong Kong's Inland Revenue Department provides interim tax treatment on court-free company amalgamations  
- India private ruling authority holds transfer of Indian subsidiary shares is not a tax avoidance transaction  
- Iraq's KRG's General Directorate of Taxation issues new tax assessment and payment procedures for oil and gas companies operating under a production sharing contract in Kurdistan  
- Kurdistan Region of Iraq issues new circular on corporate income tax filing obligations  
- Japan's 2016 tax reform includes Action 13 transfer pricing documentation requirements  
- Japan and Chile sign income tax treaty  
- Kenya enacts Tax Procedures Act, 2015  
- Kuwait investment authority clarifies means and conditions for tax exemption of investments  
- Mauritius and Morocco sign income tax treaty  
- Lower chamber of Mexico's Congress approves special economic zones bill
Country Updates

- Mexican Tax Authorities issue Administrative Rules for 2016 related to FATCA and CRS reporting  
- Morocco
- Mauritius and Morocco sign income tax treaty
- Namibia
- Namibia enacts 2015 VAT and income tax amendments
- Netherlands
- Dutch Government issues revised decree on fiscal investment institutions
- Netherlands ratifies tax treaty with Sint Maarten
- Nicaragua
- Nicaragua delays effective date for transfer pricing rules
- Nigeria
- Nigerian Tax Appeal Tribunal refutes deductibility of recharges under Deemed Profit Tax regime
- Oman
- Oman proposes new foreign capital investment law to attract foreign investment
- Poland
- Poland imposes bank/insurance levy as of 1 February 2016
- Russia
- Hong Kong and Russia sign income tax treaty
- The Draft Federal Law “Concerning the Introduction of Amendments to Article 269 of Part Two of the Tax Code of the Russian Federation Regarding the Definition of the Concept of Controlled Debt” has been passed in the third reading
- Fine-tuning the “big tax maneuver”
- Russia implements tax law changes in 2016
- The State Duma has passed amendments to the Deoffshorization Law in the second reading
- Slovakia
- Tax & Legal News: January 2016
Country Updates

South Africa

- South African Revenue Service issues revised reportable arrangement list with wider scope for reporting inbound services  
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Spain

- Spain and Mexico sign new protocol to tax treaty  
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United States

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- US IRS amends regulations allocating partnership foreign tax expense  
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- US Administration's fiscal year 2017 budget includes international tax provisions substantially similar to 2016 proposals  
  Read more
- Updated US list of foreign currency contracts possibly subject to Section 1256  
  Read more
- US IRS and Treasury issue guidance offering RICs with Section 853 elections alternative methods for handling foreign tax refunds  
  Read more
- Updated 2016 US IRC Section 1256 qualified board or exchange list  
  Read more
- Extenders/omnibus passed and signed into law
- US Senate Foreign Relations Committee approves tax agreements; further Senate action uncertain
- House, Senate committees hold hearings on BEPS, EU state aid and inversions
- Treasury grants yet another extension of time for reporting signature authority (FBAR, Form 114) over certain foreign financial accounts
- US CbC reporting regulations released on 21 December
- House bill would impose requirements on CbC collection and transmission
- US to participate in drafting OECD BEPS multilateral instrument; new US Model Treaty expected early in 2016
- Section 871(m) ELI effective date officially delayed
- More countries engaging in US automatic exchange of information
- IRS upgrades FATCA online registration system
- IRS to target inbound middle market companies for exam; US-India APA applications being accepted in 2016
- Treaty withholding tax rates  
  Read more
- Ways and Means to mark-up international tax reform bill in 2016
- US legislation has implications for certain foreign pension funds and FIRPTA
- Senate Finance Committee leaders voice concerns to Treasury over EU state aid investigations
- US government issues guidance offering RICs with Section 853 elections alternative methods for handling foreign tax refunds
Sixth Circuit holds foreign currency option is Section 1256 contract, reverses Tax Court

**Uruguay**

- Uruguay delays effective date for electronic payment requirement
- Uruguay implements tax incentives for entities that display films
- Uruguay modifies VAT for certain restaurant services
- Uruguay extends corporate income tax exemptions for manufacture of agricultural machinery and equipment
- Uruguay enacts budget for 2015-2019
- Uruguay extends tax benefits for POS terminals and other POS accessories
- Uruguay modifies international postal parcels regime

**Venezuela**

- Venezuela modifies foreign exchange rules
- Venezuela establishes new tax on large financial transactions
- Venezuela modifies Income Tax Law