On 22 July 2019, the EU Tax Dispute Resolution Act (EU-Besteuerungsstreitbeilegungsgesetz) and related amendments to the Federal Fiscal Code and the Federal Fiscal Court Act were published as part of the EU Finance Amendment Act 2019 in the Federal Law Gazette of Austria. The EU Tax Dispute Resolution Act shall enter into force on 1 September 2019 and shall be effective to any tax dispute concerning taxation periods commencing on or after 1 January 2018.

With the EU Tax Dispute Resolution Act, the Directive 2017/1852/EU on procedures for settling tax disputes in the European Union is implemented into national law. It forms a new procedural basis for the settlement of disputes between EU member states arising from the interpretation and application of DTTs or the EU Arbitration Convention. The affected natural or legal persons are entitled to submit a complaint requesting the resolution of the dispute. A mutual agreement procedure will be initiated if the dispute settlement complaint is accepted. If no agreement is reached within two years, the dispute will be resolved by temporary arbitration at the request of the person concerned. The procedure ends with a binding and enforceable final decision. During the parliamentary proceedings, there were no major changes compared to the draft bill (see our International Tax Review 02/2019 from 12 February 2019).

The EU Finance Amendment Act 2019 can be found under the following link:
https://www.ris.bka.gv.at/eli/bgbl/I/2019/62/20190722
**Austria: Supplementary prepayment of income tax/corporate income tax 2018**

If the income tax/corporate income tax 2018 of a taxpayer has not been assessed by 30 September 2019, any excess of the later assessed income tax/corporate income tax 2018 over earlier made income tax/corporate income tax prepayments 2018 will be subject to interest charged by the tax office at a current rate of 1.38% per year. To avoid the assessment of such (not tax-deductible) interest a supplementary prepayment has to be made to the tax office before 1 October 2019.

**Austria: Application for reduction of income tax/corporate income tax prepayments 2019 by 30 September 2019**

If the actual income tax/corporate income tax on the estimated taxable income 2019 is expected to be lower than the current income tax/corporate income tax prepayments 2019, it is possible to file an application for reduction of the income tax/corporate income tax prepayments with the competent tax office by 30 September 2019 at the latest. The application has to be supplemented by a detailed forecast of the taxable income 2019.

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- Bulgaria adopts mandatory transfer pricing documentation

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- Finance Canada releases draft legislation for 2019 budget measures
- Canada Border Services Agency updates trade compliance verification list

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- China-India Protocol enters into force

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- Colombian Government issues new thin capitalization regulations
- Colombia issues regulation on voluntary VAT collection system for foreign service providers of digital services

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- Cyprus Tax Department issues Circular 235 to clarify VAT treatment of vouchers

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- Germany publishes draft Annual Tax Act 2019 and draft bill on Real Estate Transfer Tax Reform

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- Nigeria's Court of Appeal upholds judgment of Federal High Court regarding imposition of VAT on services provided by nonresident companies  

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- Puerto Rico's new Quarterly Return of Tax Withheld on Payments for Services Rendered is due 31 July 2019  

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- Russian Tax Authority issues guidance on the application of beneficial ownership rules to holding companies  

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- Korea announces 2019 tax reform proposals  

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