

"International tax news, explained"

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### HAPPY FRIDAY!

The “marketing intangibles” proposal from pillar 1 (using a formula-based approach) is now a hot favourite. But the pillar 2 proposal (global anti-base erosion) is supported only by civil society groups and Germans!

But Germany has redeemed itself: the idea of imposing royalty withholding tax on outbound payments for online advertising has been dropped.

Meanwhile, the EU’s digital advertising tax is effectively dead – although Pierre Moscovici acts like the Black Knight in Monty Python and the Holy Grail!

We have a GAAR case from New Zealand, a “missing trader” VAT case from the UK, and a cash pooling case from Germany.

India tells us the GST treatment of BOGOF schemes, the EU picks on small island countries again, and everyone’s getting really nervous about a “no deal” Brexit!

Have a great weekend!

Steve

### IN TODAY'S VIDEO PODCAST

(For ITB video subscribers, please log in to access the video and documents/reports)

1. Digital taxation
2. Asia Pacific
  - Australia, India, Japan, New Zealand
3. Europe
  - EU, Germany, Italy, Netherlands, UK
4. Africa
  - Nigeria
5. Middle East & Central Asia
  - Bahrain
6. Americas
  - Colombia, US
7. Treaties
8. Worth reading

### WORTH READING

Grant D. Aldonas, [“The WTO Consistency of the Deduction for FDII”](#)  
Tax Notes International, Tax Analysts Vol. 93 (25 February 2019) (subscription service)

Aditya Pansé, [“Cognitive Biases in Functional Analysis Interviews – Part 1: Introduction and Biases Affecting Selection of the Persons to Be Interviewed”](#)  
International Transfer Pricing Journal, IBFD 2019 (Volume 26), No. 2 (subscription service)

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