

"International tax news, explained"

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7 June 2019



HAPPY FRIDAY!

IF's programme of work is impressive, until you realise that the **same pillars and proposals** were identified in **January** – there's been no consensus to **reduce the options** for 6 months! But it does look clear that the **revised profit allocation rules** under **Pillar 1** will be **based on formulae and/or arbitrary benchmarks** – so does this mean that **TP specialists** will eventually be replaced by **AI**? Sorry!

There's been way too much angst this week: the **US** beats up **Mexico** as if it were **China**, and the **Tax Justice Network** puts the boot into the **UK** (but, strangely, gives **Delaware** a free pass!). At least the **Australian** and **New Zealand** tax authorities together **make poetry!**

Hungary "defers" its advertising tax (but who pays it, anyway?), the **UK** is fixated on **Barbados** and **Singapore**, the **US** issues lots of regs (but not the regs that folks are really interested in!), **New Zealand** is sitting on the **DST** fence, and **Ghana** shows how to handle a **revenue collection shortfall** (sack all the executives at the tax authority!)

But the big question this week is this: as the **English and French texts** of the **MLI** are "**equally authentic**", does that mean that we have to consult **both texts** when interpreting the **MLI**? So should **TP specialists** be re-trained as **French interpreters**?

Have a great weekend!
Steve

#AskSteve



Episode 3
To be released on
11 June 2019

Episode 2
[How do you become a successful international tax advisor?](#)

Episode 1
[Why do you like International Tax?](#)

IN TODAY'S VIDEO PODCAST

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

1. OECD Inclusive Framework: Programme of Work on Digitalisation
2. Digital taxation: other news
3. Trade
4. Other global developments
5. Asia Pacific
 - Australia / New Zealand, Cambodia, China, India, New Zealand
6. Europe
 - EU, Hungary, Italy, Poland, Switzerland, UK
7. Africa
 - Ghana, Nigeria, Zambia
8. Middle East & Central Asia
 - Oman
9. Americas
 - US
10. Treaties
11. Worth reading

WORTH READING

Michael Wichmann

["Comment from a German \(Language\) Perspective"](#)

Bulletin for International Taxation, IBFD, 2019 (Volume 73), No. 6/7 (subscription service)

Richard Xenophon Resch

["The OECD BEPS Multilateral Instrument and the Issue of Language"](#)

Intertax, Kluwer, Volume 47, Issue 6 & 7 (subscription service)

Aditya Pansé

["Cognitive Biases in Functional Analysis Interviews – Part 2: Biases Affecting Pre-Interview Briefing and Actual Interview"](#)

International Transfer Pricing Journal, IBFD, 2019 (Volume 26), No. 4 (subscription service)

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