

### ITB video podcasts

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28 June 2019



### HAPPY FRIDAY!

The whole world will be watching **2 old men eat sushi in Osaka** tomorrow. Hold the **wasabi** – it might be hot enough without it!

Meanwhile, **Margrethe Vestager** is still a strong contender to be elected as **Commission president** on Sunday, despite losing another **tax-related State aid case** this week. Donald Trump supported her candidacy by saying that "**she hates the US perhaps more than any other person I've met**"!

We have cases on **deductive methods** (elementary, my dear Watson!), **self-propelled oil drilling rigs** (keep out of the way!), **diamond graders** (a tempting job!), **reversible bandwidth**, **MFN** provisions, **tax-loss trafficking**, and **Swedish vodka**!

Meanwhile, the **French DST** looks like a **fait accompli**, while **US senators** let off some steam.

And the Netherlands government says that **Dutch conduits** save lots of tax on **royalty flows** – but, curiously, not on **dividend or interest flows**. A case for **Mr Holmes**?

Have a great weekend!  
**Steve**

### #AskSteve



#### Episode 4

What big changes have you seen in international tax practice over your career?

#### Episode 3

Is foreign experience important for an international tax career?

#### 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. France's DST
2. Trade & other global developments
3. Asia Pacific
  - Australia, India, Indonesia, Korea
4. Europe
  - ECJ, EGC, EU, Netherlands, Norway, Poland, Slovenia, Sweden
5. Africa
  - Angola, Nigeria, South Africa
6. Americas
  - Brazil, US
7. Treaties
8. Worth reading

### WORTH READING

Jefferson VanderWolk and Robert O'Hare

"The OECD / Inclusive Framework's Program of Work on Revised Nexus and Profit Allocation Rules (Pillar One): Where Will It Lead?"

Kluwer International Tax Blog (25 June 2019) (free service)

Rita de la Feria

"The New VAT General Reverse-Charge Mechanism"

EC Tax Review, Kluwer, 2019/4 (subscription service)

### HMM...

**Is a tax-transparent partnership a "person" for the purposes of the OECD model double tax treaty?**

Answer in next week's ITB email alert!

Last week's solution

The answer is not 20! (That would be too easy!)

Membership of the G20 consists of 19 countries and the EU (which is represented by the European Commission and the European Central Bank).

So, probably, the answer is 19.

However, the EU consists of 28 countries, 4 of which are G20 members in their own right. That leaves 24 countries which (arguably) are G20 members indirectly via the EU.  $19 + 24 = 43!$

**My final answer: 19**

### OVERHEARD

**Overheard at breakfast at an international tax conference:**

"Good morning – I'd like a grande latte, extra shot."

"Sir, do you want a grande or do you want extra short?"

"Both – grande and extra shot."

"Sir, it can't be both – it's either grande or extra short."

"Aiyah! Just give me a regular grande and a single espresso."

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