ITB International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 3, 17, 24 & 31 Oct)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**
  - 3 more signatories to GIR-MCAA: **3 Oct**
  - Pillars One & Two: **3 Oct**
  - Hong Kong: Updated guidance on GloBE rules: **3 Oct**
  - 3 German States (Bavaria, Hesse, and North Rhine-Westphalia) request Federal parliament to suspend GloBE rules: **3 Oct**
  - German discontent: **17 Oct**
  - G7 "side-by-side" agreement with US: **17 Oct, 31 Oct**
  - Other recent developments: Israel, France, and Turkey: **17 Oct**
  - Cabo Verde: 15% domestic minimum top-up tax will be introduced: **24 Oct**
  - Australia: Guidance on transitional country-by-country reporting safe harbour: **24 Oct**
  - Vietnam: Regulations on administrative procedures and related forms under GloBE rules: **24 Oct**
  - EU: Discussion paper co-authored by members of the Tax Foundation and the University of Mannheim: **24 Oct**
  - Netherlands: Guidance on exemption from GloBE rules for a REIT which distributes 90% of its income: **31 Oct**
  - Belgium: Guidance on GloBE rules: **31 Oct**
  - ECJ: European Court of Justice dismisses company's appeal in Fugro's case: **31 Oct**
- **Tariff wars**
  - US: New tariffs to commence on 14 October: **3 Oct**
  - China: rare earth exports, US's response, and China's response: **17 Oct**
  - China / US: Trade dispute heads to Korea next week: **24 Oct**
  - US: trucks & buses: **24 Oct**
  - Colombia / US: President Trump threatens new tariffs: **24 Oct**
  - China / US: Agreement reached: **31 Oct**
  - Canada / US: All trade negotiations terminated, US imposes 10% tariff: **31 Oct**
  - US / Southeast Asian countries (Cambodia, Malaysia, Thailand, Vietnam): Several trade agreements signed: **31 Oct**
  - US / Japan and Korea: Trade agreements signed: **31 Oct**
- **Other global developments**
  - MLI arbitration profiles (Australia, Belgium, Netherlands, and New Zealand): **3 Oct**
  - Public comments on toolkit for transfer pricing of copper: **3 Oct**
  - OECD: reports in preparation for G20 finance ministers meeting: **17 Oct**
  - Signatories of GIR-MCAA: **17 Oct**
  - OECD: proposed updates to Chapter VII (Services) of Transfer Pricing Guidelines: **17 Oct**
  - OECD: home office permanent establishment: **17 Oct**
  - OECD: updated transfer pricing country profiles: **24 Oct**
  - International Maritime Organization (IMO): "Net Zero Framework": **24 Oct**
  - UN: draft template for Framework Convention: **31 Oct**

International tax cases

- Bunge (Spain) (Transfer pricing treatment of cash pooling arrangement): 3 Oct
- 3M (US) (Transfer pricing "blocked income" case; application of Loper Bright): 3 Oct
- HMTX Industries (US) (Tariffs imposed on Chinese imports by first Trump Administration are declared valid): 3 Oct
- Amazon DST (France) (Does French DST apply to Fulfilled by Amazon and Amazon Prime?): 24 Oct
- Malta dual resident company case (Netherlands) (Does company qualify for benefits under Malta / Netherlands double tax treaty?): 24 Oct
- Fugro (ECJ) (Claim for partial annulment of EU GloBE Directive): 31 Oct
- Oracle (Australia) (MAP vs. court proceedings; taxpayer's choice; "stay" of court proceedings, pending finalisation of MAP): 31 Oct
- Husky Energy (Canada) (treaty shopping; "beneficial owner" of dividends; Canada / Luxembourg treaty; securities lending arrangement): 31 Oct

Asia Pacific

- **Australia**
  - Capital raised for purpose of funding franked distributions: **3 Oct**
  - Final guidance on thin capitalisation topics (third party debt test and restructures): **3 Oct**
  - Report on tax disputes and settlements: **3 Oct**
  - Updated APA guidance: **31 Oct**
  - See "GloBE rules" (above)
  - See "International tax cases" (above)
- **Hong Kong**
  - See "GloBE rules" (above)
- **India**
  - Permanent establishments and profit attribution: **17 Oct**
  - APA report 2024-25: **24 Oct**
- **Malaysia**
  - 2026 Budget: **17 Oct**
- **New Zealand**
  - 4 items of guidance:
    - income tax treatment of gains on disposal of crypto assets
    - income tax deductibility of sponsorship expenditure
    - income tax treatment of off-market share cancellations
    - meaning of "taxable activity" for GST purposes: **17 Oct**
  - GST treatment of payment processing and facilitation services to merchants: **24 Oct**
- **Philippines**
  - Deferral of e-invoicing deadline: **24 Oct**
- **Singapore**
  - Liquidation distribution in specie of appreciated shares in non-resident companies: **3 Oct**
  - 2 items of guidance:
    - certainty of non-taxation of companies' gains on disposal of equity investments
    - income tax deduction for shares used to fulfil obligations under employee equity-based remuneration scheme: **17 Oct**
- **Sri Lanka**
  - Colombo Port City special economic zone: **3 Oct**
  - VAT on inbound digital services: **17 Oct**
- **Taiwan**
  - R&D expenditure: **3 Oct**
  - Accumulated earnings statement: **31 Oct**
- **Thailand**
  - Tax incentives to support domestic tourism: **31 Oct**
- **Vietnam**
  - Bonuses for tax officials: **24 Oct**
  - Summary of main changes in new corporate income tax law: **24 Oct**
  - See "GloBE rules" (above)

Europe

- **Austria**
  - Increase in investment allowance: **31 Oct**
- **Belgium**
  - Financial fixed asset requirement: **17 Oct**
  - Dividend withholding tax: **17 Oct**
  - Expansion of tax exemption to cover sister mergers: **31 Oct**
  - See "GloBE rules" (above)
- **Bulgaria**
  - Draft ordinance on transfer pricing rules: **17 Oct**
- **EU**
  - European Trust and Cooperation Approach: **3 Oct**
  - CBAM simplification: **3 Oct**
  - Non-cooperative tax jurisdictions: **17 Oct**
  - Proposals to protect EU steel industry from global overcapacity: **17 Oct**
  - Disparities in EU VAT rates: **17 Oct**
  - EU / Switzerland sign tax cooperation protocol: **24 Oct**
  - 2026 Work Program: **24 Oct**
  - VAT rules for travel and tourism sectors: **24 Oct**
  - Professional secrecy for tax advice: **31 Oct**
  - See "GloBE rules" (above)
  - See "International tax cases" (above)
- **Finland**
  - Increase in tax on mining activities: **3 Oct**
- **France**
  - Draft 2026 Finance Bill: **17 Oct**
  - DST: **31 Oct**
  - See "GloBE rules" (above)
  - See "International tax cases" (above)
- **Germany**
  - See "GloBE rules" (above)
- **Greece**
  - Corporate reorganisations: **17 Oct**
- **Ireland**
  - 2026 Budget: **17 Oct**
  - E-invoicing and real-time VAT reporting: **17 Oct**
- **Italy**
  - Council of Ministers approves Budget: **17 Oct**
  - Draft 2026 Budget Law: **24 Oct**
- **Malta**
  - 2026 Budget: **31 Oct**
- **Netherlands**
  - New VAT obligations for digital platforms: **17 Oct**
  - Updated decree on dividend withholding tax: **24 Oct**
  - VAT exemption for share intermediation services: **24 Oct**
  - Draft legislation on cross-border conversion of legal entities: **24 Oct**
  - Withholding tax on dividends and interest: **31 Oct**
  - See "GloBE rules" (above)
  - See "International tax cases" (above)
- **Portugal**
  - 2026 Budget: **17 Oct**
- **Slovak Republic**
  - Updated guidance on transfer pricing documentation: **31 Oct**
- **Spain**
  - See "International tax cases" (above)
- **Sweden**
  - VAT on transfers of a going concern: **17 Oct**
- **Switzerland**
  - EU / Switzerland sign tax cooperation protocol: **24 Oct**
- **Turkey**
  - DST: **31 Oct**
  - See "GloBE rules" (above)
- **UK**
  - National insurance contributions for internationally mobile employees: **3 Oct**
  - R&D activities: **3 Oct**
  - R&D Expert Advisory Panel: **24 Oct**
  - Patent box regime: **24 Oct**

Africa

- **Cabo Verde**
  - See "GloBE rules" (above)
- **Tunisia**
  - Draft Finance Law 2026: **24 Oct**
- **Zambia**
  - Removal of excess interest carry forward limits: **3 Oct**

Middle East & Central Asia

- **Israel**
  - See "GloBE rules" (above)
- **UAE**
  - E-invoicing: **3 Oct**
  - VAT input tax apportionment: **12 Sep**

Americas

- **Argentina**
  - Repeal of mandatory disclosure regime: **24 Oct**
- **Brazil**
  - Provisional Measure 1,303/2025 expires: **17 Oct**
  - REDATA regime for data centres: **17 Oct**
  - Signs BEPS MLI: **24 Oct**
- **Canada**
  - See "International tax cases" (above)
- **Chile**
  - Guidance on cross-border transaction: **24 Oct**
  - Outbound software licence fees: **31 Oct**
- **Colombia**
  - Modified reporting obligations for digital platform operators: **17 Oct**
- **Peru**
  - Income tax and VAT incentives for Private Economic Zones: **17 Oct**
- **US**
  - Interim guidance and partially withdrawn proposed regulations on CAMT: **3 Oct**
  - Withdrawal of proposed regulations on spin-off transactions: **3 Oct**
  - Rejects International Maritime Organisation's "Net Zero Framework": **17 Oct**
  - Proposed regulations on Qualified Investment Entity status: **24 Oct**
  - Source of certain "borrow fees": **24 Oct**
  - See "International tax cases" (above)

Treaty news

- **Treaties signed**
  - Belgium / Kenya
  - Liechtenstein / Montenegro
  - Andorra / Estonia
  - Latvia / Liechtenstein
  - Hong Kong / Rwanda[1]
  - Australia / Ukraine
  - Iceland / New Zealand
- **Treaties enter into force**
  - Croatia / Saudi Arabia
  - India / Qatar
  - Japan / Turkmenistan (on 27 November 2025)
- **Protocol signed**
  - Georgia / San Marino
- **Protocol enters into force**
  - Brazil / Chile

[1] Due to Hong Kong's status, not strictly a treaty.

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