



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 6, 13, 20 & 27 Mar)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**
 - Detailed review:
 - Simplified ETR Safe Harbour (part 3): **6 Mar**
 - Simplified ETR Safe Harbour (part 4): **13 Mar**
 - Simplified ETR Safe Harbour (part 5): **20 Mar**
 - Simplified ETR Safe Harbour (part 6): **27 Mar**
 - GloBE news:
 - OECD: further guidance on GloBE rules: **20 Mar**
 - Australia (below)
 - EU (below)
 - Ireland (below)
 - Korea (below)
 - Malta (below)
 - Netherlands (below)
 - South Africa (below)
 - UK (below)
- **Tariff wars**
 - US: refunds of IEEPA tariffs: **6 Mar, 13 Mar**
 - US: 10% will soon be 15%: **6 Mar**
 - Spain / US: US threatens full trade embargo on Spain: **6 Mar**
 - USTR launches section 301 investigations: **13 Mar**
 - USTR launches second set of section 301 investigations: **20 Mar**

International tax cases

- **Belgium CFC case (C-524/23) (Court's decision on whether Belgium correctly transposed CFC rules in EU's Anti-Tax Avoidance Directive (ATAD)) (ECJ): **6 Mar****
- **Virtual gold VAT case (C-472/24) (Are sales of in-game gold subject to VAT?) (ECJ): **13 Mar****
- **Velcro (EU Interest and Royalties Directive – Netherlands / Spain treaty – beneficial ownership test) (Spain): **13 Mar****
- **Liebherr (Non-discrimination – Art. 26(5) of France / Switzerland double tax treaty) (France): **20 Mar****
- **C & W Offshore (Beneficial ownership of royalties – Art. 12 of Canada / UK double tax treaty – agency or conduit?) (Canada): **20 Mar****
- **Vestas Wind (Application of non-discrimination article in Denmark / India double tax treaty) (India): **27 Mar****

Asia Pacific

- **Australia**
 - Public CbC reports: **6 Mar**
 - Critical minerals production tax incentive: **13 Mar**
 - Mining and petroleum exploration expenditure: **20 Mar**
 - Updated guidance on GloBE rules: **20 Mar**
 - R&D report: **20 Mar**
 - PepsiCo case – Decision Impact Statement: **20 Mar**
 - Thin capitalisation review: **27 Mar**
 - Thin capitalisation – Australian branches of foreign banks: **27 Mar**
 - Australia / EU free trade agreement: **27 Mar**
 - 2 items of guidance on GloBE rules: **27 Mar**
 - Guidance for tax practitioners on AI use: **27 Mar**
- **Hong Kong**
 - Stamp duty: **13 Mar**
 - Funds and family offices: **13 Mar**
 - "Qualifying ship lessor": **27 Mar**
- **India**
 - FAQs on transition to Income-tax Act, 2025: **27 Mar**
 - Income-tax Rules, 2026: **27 Mar**
 - See "International tax cases" (above)
- **Indonesia**
 - Export tax on nickel and coal: **27 Mar**
- **Japan**
 - 2026 tax reform bill: **6 Mar**
- **Korea**
 - Proposed Ministerial Decree: **13 Mar**
 - Decree amends international tax rules: **20 Mar**
- **Malaysia**
 - Tax treatment for unit holders of REITs or PTFs: **27 Mar**
- **Sri Lanka**
 - Tax law amendment bill: **6 Mar**
- **Vietnam**
 - Transfer pricing and CbC reporting: **27 Mar**

Europe

- **Belgium**
 - 5% capital gains tax on disposal of shares in certain investment companies: **6 Mar**
- **Cyprus**
 - Payments to low-tax jurisdictions: **20 Mar**
- **EU**
 - March infringements package: **13 Mar**
 - Side-by-Side Safe Harbour: **13 Mar**
 - EU Inc.: **20 Mar**
 - See Australia (above)
 - See "International tax cases" (above)

Europe (cont'd)

- **Finland**
 - Proposed reduction in corporate income tax rate: **6 Mar**
 - Offshore windmills: **27 Mar**
- **France**
 - VAT and dropshipping: **13 Mar**
 - New dividend withholding tax rules for certain outbound dividends: **20 Mar**
 - See "International tax cases" (above)
- **Guernsey**
 - 5 options to amend corporate taxation – now 4 options: **13 Mar**
- **Ireland**
 - Updated guidance on GloBE rules: **27 Mar**
- **Italy**
 - CFC rules: **13 Mar**
 - VAT on merger leveraged buyout costs: **13 Mar**
 - Proposed changes to 2026 Budget Law: **20 Mar**
- **Lithuania**
 - Profit distributions from transparent entities: **27 Mar**
- **Malta**
 - Exemption from filing GIR and related GloBE notifications: **6 Mar**
- **Meta**
 - Location fees on ads delivered to countries with DSTs: **20 Mar**
- **Montenegro**
 - 15% domestic minimum top-up tax: **6 Mar**
- **Netherlands**
 - Guidance on definition of "treaty permanent establishment" in GloBE legislation: **6 Mar**
 - Proposed adjustment of tax treatment of foreign exchange results on hedging instruments under participation exemption: **6 Mar**
 - E-invoicing: **20 Mar**
- **Poland**
 - Government proceeding with 3% DST: **27 Mar**
- **Romania**
 - Emergency ordinance: **6 Mar**
- **Russia**
 - VAT on imported goods purchased through online marketplaces: **27 Mar**
 - Mutual agreement procedure: **27 Mar**
 - Deadline for foreign entities to claim tax refunds: **27 Mar**
- **Spain**
 - See "International tax cases" (above)
- **Sweden**
 - R&D tax incentives: **6 Mar**

Europe (cont'd)

- **Ukraine**
 - Proposed implementation of EU's ATAD: **6 Mar**
 - Transfer pricing: **6 Mar**
- **UK**
 - 40% first-year allowance: **6 Mar**
 - Reduction in GloBE tax revenue estimates: **6 Mar**
 - Energy Profits Levy: **6 Mar**
 - Format of corporation tax computations: **13 Mar**
 - Transfer pricing and diverted profits tax: **13 Mar**
 - Proposals to extend scope of uncertain tax treatment regime: **20 Mar**

Africa

- **Ethiopia**
 - New performance-based investment incentive regime: **27 Mar**
- **South Africa**
 - CARF: **13 Mar**
 - Significantly reduced estimated revenue from GloBE rules: **20 Mar**

Middle East & Central Asia

- **Azerbaijan**
 - VAT on inbound digital services: **13 Mar**
- **Bahrain**
 - VAT treatment of imports and exports: **20 Mar**
- **Qatar**
 - Direct application of treaty withholding tax rates: **20 Mar**
- **UAE**
 - New R&D tax incentive regime: **20 Mar**

Americas

- **Brazil**
 - Interest on net equity: **20 Mar**
- **Canada**
 - See "International tax cases" (above)
- **Chile**
 - Software distribution: **20 Mar**
- **Colombia**
 - Net wealth tax extended to branches and PEs: **20 Mar**
- **US**
 - Notice 2026-20: **20 Mar**
 - Rev. Proc. 2026-17: **20 Mar**

Treaty news

- **Treaties signed**
 - Hong Kong / Kyrgyzstan¹
 - Taiwan / Tuvalu²
 - Belarus / Myanmar
 - Barbados / Hong Kong¹
- **Treaty enters into force**
 - North Macedonia / Vietnam (on 28 August 2025 – late notice!)
- **Treaties terminated / suspended**
 - Finland / Russia (suspended by Finland)
 - Belarus / Italy (partially suspended by Italy)
 - Italy / Russia (partially suspended by Italy)
- **Protocol enters into force**
 - Cambodia / Singapore

¹ Not strictly a treaty, due to Hong Kong's status.

² Not strictly a treaty, due to Taiwan's status.

ITB video podcasts are available on our [website](#) or app.
For a free trial, contact us at itb@internationaltaxbytes.com.



Subscribe to our free newsletter [here!](#)