



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 10, 17, 24 Apr & 8 May)

Recent topics (Last 4 videos)

Global topics

- **Pillar One**

- Belgium (see below)
- Luxembourg (see below)

- **GloBE rules**

- Detailed review:
 - Simplified ETR Safe Harbour (Part 7): **17 Apr**
 - Simplified ETR Safe Harbour (Part 8): **24 Apr**
- OECD: Implementation Toolkit and updated FAQs: **8 May**
- GloBE news:
 - Belgium (see below)
 - Brazil (see below)
 - China (see below)
 - Finland (see below)
 - Germany (see below)
 - Kuwait (see below)
 - Netherlands (see below)
 - Qatar (see below)
 - Switzerland (see below)
 - Turkey (see below)

- **Tariff wars**

- US: 50% tariffs on steel, aluminum, and copper: **10 Apr**
- US: tariffs on imported pharmaceutical products: **10 Apr**
- US: imports from countries supplying military weapons to Iran: **10 Apr**
- US: refund of unlawful IEEPA tariffs: **17 Apr, 8 May**
- US: section 301 tariffs: **17 Apr**
- US / EU: plans to increase tariffs on EU automobile imports to 25%: **8 May**
- US / UK: "a big tariff" on imports from UK, if UK does not repeal its digital services tax: **8 May**
- China / 20 African countries: 0% tariff will apply to wide range of imports from 20 African countries: **8 May**

- **Other global developments**

- WTO: expiry of moratorium on customs duties on electronic transmissions: **10 Apr**
- International Tax Observatory: lessons for windfall profits taxes: **10 Apr**
- Taxation responses to Iran war: **17 Apr**
- OECD: G20 report: **17 Apr**
- OECD: guidance on investment tax incentives: **8 May**
- OECD: peer review reports on tax transparency and EOIR: **8 May**

International tax cases

- **Coupole Finance (France)** (permanent establishment – France / Luxembourg treaty – place of effective management): **17 Apr**
- **Globe Capital Market (India)** (buy-back of shares by company at undervalue): **24 Apr**
- **Gunfleet Sands (UK)** (does pre-construction expenditure on environmental impact assessments and other technical studies qualify for capital allowances?): **24 Apr**
- **Burlington Loan Management (UK)** (interest withholding tax; Art. 12(5) of Ireland / UK treaty): **8 May**

Asia Pacific

- **Australia**
 - Foreign resident capital gains tax: **17, 24 Apr**
 - Transfer pricing issues related to inbound distribution: **24 Apr**
 - News Bargaining incentive: **8 May**
- **China**
 - China: Denmark, Ireland, and UAE: guidance (aimed at Chinese companies) explaining how Denmark, Ireland, and UAE have implemented GloBE rules: **8 May**
- **Hong Kong**
 - Minutes of annual meeting between tax authorities and accounting body: **10 Apr**
- **India**
 - Amendment clarifying GAAR grandfathering rules: **10 Apr**
 - APA report 2025-2026: **10 Apr**
 - Finance Act 2026: **10 Apr**
 - Colorcon case – Supreme Court to hear SLP: **8 May**
 - India provides treaty assurance to Mauritius: **8 May**
 - See "International tax cases" (above)
- **Japan**
 - 2026 tax reform legislation: **10 Apr**
- **Malaysia**
 - Exchange rate for sales tax and service tax: **8 May**
- **New Zealand**
 - Updated transfer pricing documentation guidance: **10 Apr**
- **Philippines**
 - Tax treatment of inbound services: **17 Apr**
- **Singapore**
 - Income tax treatment of amalgamation: **8 May**
- **Sri Lanka**
 - VAT on inbound digital services: **10 Apr**
- **Taiwan**
 - Double tax treaty benefits – inbound digital services: **10 Apr**
- **Vietnam**
 - Circular 20: **10 Apr**
 - Tax audits for long-term loss-making and low-margin enterprises: **24 Apr**

Europe

- **Austria**
 - Corporate income tax rate: **8 May**
- **Belgium**
 - Amount B: **10 Apr**
 - Meaning of "financial fixed asset" for purposes of dividend withholding tax exemption: **10 Apr**
 - Deferral of tax return filing deadline for IIR and DMTT: **10 Apr**
 - Possible DST: **24 Apr**
- **Denmark**
 - See "China" (above)
- **EU**
 - Agreement to reform EU Customs Code: **10 Apr**
 - Possible windfall tax on energy companies' profits: **10 Apr**
 - Reduced VAT rate on fuel: **10 Apr**
 - CBAM certificates: **10 Apr**
 - Plan to improve EU lawmaking: **8 May**
 - Commission refers Hungary to ECJ regarding retail tax regime: **8 May**
 - Temporary State aid framework in response to Middle East crisis: **8 May**
- **Finland**
 - Guidance on numerous safe harbours under the GloBE rules: **17 Apr**
 - Corporate income tax rate and loss carry-forward period: **8 May**
- **France**
 - MAP and APAs: **24 Apr**
 - Deadlines for claims relating to withholding tax: **8 May**
 - New Customs Code: **8 May**
 - See "International tax cases" (above)
- **Germany**
 - List of jurisdictions which have implemented qualified GloBE rules: **17 Apr**
- **Hungary**
 - Advertising tax: **24 Apr, 8 May**
- **Ireland**
 - Participation exemption: **10 Apr**
 - Outbound payments defensive measures: **10 Apr**
 - Classification of foreign entities for Irish tax purposes: **24 Apr**
 - R&D tax credit and investment limited partnerships: **8 May**
 - See "China" (above)
- **Italy**
 - Decree amending several provisions in 2026 Budget Law: **10 Apr**
- **Lithuania**
 - Transfer of tax losses within group of companies: **10 Apr**
- **Luxembourg**
 - Amount B: **24 Apr**

Europe (cont'd)

- **Netherlands**
 - Spring Memorandum: **10 Apr**
 - Dutch characterisation of Spanish AIE: **17 Apr**
 - Dividend stripping: **17 Apr**
 - Guidance on definition of "joint venture" in GloBE rules: **17 Apr**
 - Additional dividend stripping measures: **24 Apr**
- **Switzerland**
 - Guidance on GloBE rules: (1) application of Side-by-Side Package; and (2) transitional provision, Art. 9.1: **17 Apr**
 - Extension of tax loss carry forward period: **24 Apr**
 - Extension of withholding tax exemption for TBTF (too big to fail) instruments: **8 May**
- **Turkey**
 - Domestic minimum corporate income tax: **10 Apr**
 - GloBE rules: draft GloBE return forms and implementation guidance: **17 Apr**
 - Comprehensive tax reform package: **8 May**
- **UK**
 - Corporate redomiciliation: **10 Apr**
 - Taxation of stablecoins: **10 Apr**
 - Foreign income and gains (FIG) regime: **10 Apr**
 - CBAM (1): **17 Apr**
 - CBAM (2): **17 Apr**
 - Electricity Generator Levy: **8 May**
 - See "International tax cases" (above)

Africa

- **Kenya**
 - Tax exemption for qualifying asset transfers as part of internal reorganisation: **24 Apr**
 - Finance Bill 2026: **8 May**
- **Liberia**
 - Tax law amendments: **17 Apr**
- **Morocco**
 - Inbound digital services: **17 Apr**
- **South Africa**
 - Removal of VAT exclusion threshold for low-value imports: **24 Apr**
 - Bilateral APAs: **8 May**

Middle East & Central Asia

- **Israel**
 - R&D incentives: **24 Apr**
- **Kuwait**
 - Interaction of 5% tax retention rules and domestic minimum top-up tax: **17 Apr**
 - Kuwait: optional advance tax system for MNE groups which are within scope of domestic minimum top-up tax: **8 May**
- **Qatar**
 - Guidance and FAQs on GloBE rules: **10 Apr**
 - Intra-group corporate restructurings: **17 Apr**
- **UAE**
 - See "China" (above)

Americas

- **Brazil**
 - Guidance on reporting and payment of additional social contribution on net profit (equivalent to domestic minimum top-up tax): **17 Apr**
 - Treatment of US LLCs: **8 May**
 - Indirect tax reform: **8 May**
- **Canada**
 - Tax measures in 2025 Budget enacted: **10 Apr**
- **Chile**
 - Corporate income tax rate: **24 Apr**
- **Colombia**
 - Additional tax measures enacted under state of economic emergency declared unconstitutional: **24 Apr**
- **Jamacia**
 - OECD capacity-building: **10 Apr**
- **US**
 - APA program report: **10 Apr**
 - 1% excise tax on remittance transfers: **17 Apr**
 - Qualified tips: **17 Apr**
 - Foreign insurance companies: **17 Apr**
 - Rev. Proc. 2026-21: **8 May**

Treaty news

- **Treaties signed**
 - Egypt / Morocco
 - Algeria / Serbia
 - Argentina / Czech Republic
 - Belgium / Kosovo
 - Turkey / Zambia
 - Botswana / Rwanda
 - Belgium / Liechtenstein
 - Tanzania / Turkey
- **Treaties enter into force**
 - Andorra / Estonia
 - Malaysia / Maldives
 - Kenya / Singapore
 - Cyprus / Vietnam (on 1 June 2026)
- **Protocols signed**
 - Bahrain / Bermuda
 - Croatia / US
- **Protocol enters into force**
 - Malta / San Marino
- **MFN clause triggered**
 - Estonia / France (interest and royalties)
- **Memorandum of Understanding signed**
 - France / Switzerland (on telework)

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