



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 26 Jun, 3, 17, 24 Jul)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**

- GloBE news:
 - Belgium (see below)
 - Luxembourg (see below)
 - Netherlands (see below)
 - UK (see below)
 - OECD: updated economic impact assessment: **17 Jul**
 - OECD: MNE responses to Global Minimum Tax: **17 Jul**

- **Public CbC Reports**

- Australia and EU: **3 Jul**

- **Tariff wars**

- 100% tariffs: DST: **3 Jul**
- US: 10% / 12.5% "forced labour" tariffs: **24 Jul**
- US: 50% tariff on imports from Canada: **24 Jul**
- US: 25% tariff on imports from Brazil: **24 Jul**
- US: Aluminum: **24 Jul**

- **Other global developments**

- OECD: Corporate Tax Statistics: **24 Jul**
- UN: framework convention on international tax cooperation, and 2 early protocols: **24 Jul**

International tax cases

- **FX case (Japan)** (Does the swapping of one foreign currency for another foreign currency, require taxable gain to be recognised?): **26 Jun**
- **Credit management case (EGC)** (Are credit management services performed by original lender subject to VAT where underlying loans have been transferred?): **26 Jun**
- **Lifepius Europe (UK)** (Taxpayer challenge to tax authority transfer pricing information request): **26 Jun**
- **IMAX case (India)** (Remote maintenance services for theatre systems – permanent establishment under Canada / India double tax treaty?): **3 Jul**
- **Nova Iberomoldes (ECJ)** (Portugal not permitted to impose real estate transfer tax on the contribution, to another company, of shares in companies owning immovable property, if the contribution qualifies as a restructuring operation under the EU Capital Duties Directive): **3 Jul**
- **Liquidation dividends case (Germany)** (Dividends paid during a liquidation can benefit from the withholding tax exemption under the EU Parent-Subsidiary Directive, provided the distributed profits are generated before the commencement of the liquidation): **3 Jul**
- **Sampension case (EGC)** (Validity of eligibility restrictions on formation of VAT groups – EU VAT Directive): **24 Jul**
- **Alteo Energy case (Mauritius)** (Interest income exemption is not limited to companies whose core business is financing or money lending – consideration of BEPS Action 5 (Privy Council decision)): **24 Jul**
- **Keysight Technologies case (US)** (Court holds that a Treasury rule in GILTI regulations is invalid, because Treasury lacked the statutory authority to issue the rule (Court of Federal Claims decision)): **24 Jul**
- **Siemens Medical Solutions (US)** (Court holds that a Treasury rule in "dividends received deduction" regulations is invalid, because Treasury lacked the statutory authority to issue the rule (US Tax Court decision)): **24 Jul**

Asia Pacific

- **Australia**
 - Capital gains tax proposed changes: **26 Jun**
 - Permanent establishments: **3 Jul**
 - Pre-disposal security arrangements: **3 Jul**
 - Regulation of accounting, auditing and consulting firms: **3 Jul**
 - 30% minimum tax on discretionary trusts: **17 Jul**
 - Capital gains tax changes for foreign residents: **17 Jul**
 - R&D tax incentive: **17 Jul**
 - Critical minerals production incentive: **24 Jul**
 - See "Public CbC reports" (above)
- **China**
 - End of tax exemptions for certain vehicles: **17 Jul**
 - Business reorganisations: **24 Jul**
- **Indonesia**
 - E-commerce platforms: **3 Jul**
 - International Financial Centre: **24 Jul**
- **India**
 - See "International tax cases" (above)
- **Japan**
 - 1% consumption tax rate on food and beverages: **26 Jun**
 - See "International tax cases" (above)
- **Korea**
 - 2% Digital services tax: **17 Jul**
- **Malaysia**
 - Extension of stamp duty voluntary disclosure program: **3 Jul**
 - Updated service tax guidance on employment services: **17 Jul**
 - E-invoice special voluntary disclosure program: **17 Jul**
- **Singapore**
 - GST input tax: **3 Jul**
 - Withholding tax: **17 Jul**
 - Foreign source income remittance rule: **17 Jul**
- **Sri Lanka**
 - Withholding tax and advance income tax: **26 Jun**
- **Vietnam**
 - Extension of 2026 payment deadlines: **3 Jul**
 - Circular 95: **17 Jul**
 - E-invoicing: **24 Jul**

Europe

- **Belgium**
 - GIR notification filing deadline: **26 Jun**
- **EU**
 - EU tax simplification package: **26 Jun**
 - Tax report for first half of 2026: **26 Jun**
 - VAT treatment of EUR 3 customs duty and handling fee: **26 Jun**
 - VAT: supply of goods vs. supply of services: **26 Jun**
 - Study on VAT framework for financial services: **3 Jul**
 - Evaluation of ATAD: **3 Jul**
 - 2 developments on CBAM: **17 Jul**
 - EU emissions trading system: **17 Jul**
 - July 2026 infringements package: **17 Jul**
 - Annual Report on Taxation: **17 Jul**
 - Foreign Subsidies Regulation: **24 Jul**
 - See "International tax cases" (above)
 - See "Public CbC reports" (above)
- **France**
 - Levy on ultrafast fashion: **3 Jul**
 - E-invoicing: **17 Jul**
- **Germany**
 - New model double tax treaty: **17 Jul**
 - See "International tax cases" (above)
- **Greece**
 - New tax rules for AIFs, PEs, and investment incentives: **17 Jul**
- **Hungary**
 - Transfer pricing: **24 Jul**
- **Ireland**
 - Dividend withholding tax on dividends paid to partnerships: **3 Jul**
- **Lithuania**
 - Public consultation on 2 transfer pricing documents: **17 Jul**
- **Luxembourg**
 - Employee stock option plans: **17 Jul**
 - GloBE Side-by-Side package: **24 Jul**
- **Netherlands**
 - Guidance on GloBE rules: **26 Jun**
 - Comparability of foreign entities with Dutch legal entity: **3 Jul, 17 Jul, 24 Jul**
 - Deductibility of foreign DST: **17 Jul**
 - Treatment of licence fees under Australia / Netherlands double tax treaty: **17 Jul**
 - Treatment of immovable property and mortgage debts under Belgium / Netherlands double tax treaty: **24 Jul**
 - CFC rules and participation exemption: **24 Jul**

Europe (cont'd)

- **Norway**
 - Mandatory digital bookkeeping and e-invoicing requirements: **26 Jun**
 - Public CbC reporting: **17 Jul**
- **Poland**
 - Mandatory disclosure rules: **17 Jul**
 - 60% windfall tax: **24 Jul**
 - APA report 2006-2025: **24 Jul**
- **Romania**
 - Transfer pricing and APAs: **3 Jul**
- **Turkey**
 - Extension of 0% withholding on certain government securities: **26 Jun**
- **Ukraine**
 - Outbound payments for digital advertising services: **17 Jul**
- **UK**
 - Consultations and policy papers: **26 Jun**
 - Distributions and capital repayments by companies: **26 Jun**
 - Electricity Generator Levy: **26 Jun**
 - Support for physical retail locations: **26 Jun**
 - 2 customs consultations: **3 Jul**
 - Tax treatment of pre-development costs: **17 Jul**
 - Side-by-Side package: **17 Jul**
 - New criminal tax offence: **17 Jul**
 - Mandatory foreign permanent establishment exemption: **17 Jul**
 - Proposal to simplify withholding tax on outbound interest: **17 Jul**
 - VAT removed on household electricity: **24 Jul**
 - See "International tax cases" (above)

Africa

- **Botswana**
 - Several tax changes: **17 Jul**
- **Mauritius**
 - See "International tax cases" (above)
- **South Africa**
 - APAs: **24 Jul**
- **Tanzania**
 - DST rate increased: **17 Jul**

Middle East & Central Asia

- **UAE**
 - Corporate tax losses: **3 Jul**
 - Downward TP adjustments: **17 Jul**

Americas

- **Argentina**
 - Super RIGI: **3 Jul**
- **Chile**
 - Deductibility of purchased carbon credits: **17 Jul**
 - Proposed tax reform package: **24 Jul**
- **Dominican Republic**
 - Several tax changes: **17 Jul**
- **Peru**
 - Catalogue of schemes likely subject to GAAR: **17 Jul**
- **US**
 - USMCA: **3 Jul**
 - Virginia imposes electricity consumption tax on data centres: **17 Jul**
 - See "International tax cases" (above)

Treaty news

- **Treaties signed**
 - Netherlands / Sweden
 - Andorra / Bulgaria
 - Chile / Paraguay
 - Hong Kong¹ / Nigeria
- **Treaties enter into force**
 - Belarus / Jordan
 - Monaco / UAE
 - Bahrain / Jersey
 - Japan / Kyrgyzstan
 - Kuwait / Qatar
- **Protocol signed**
 - Cyprus / Sweden
- **Protocols enter into force**
 - Malta / Romania
 - Jersey / Mauritius
 - India / Sri Lanka
- **Exchange of Notes signed**
 - Turkey / Uruguay
- **Memorandum of Understanding signed**
 - Sweden / UK (on arbitration)
- **Competent authority arrangements signed**
 - Canada / France (on MLI arbitration process)
 - Australia / Japan (on MLI arbitration process)
 - Finland / Netherlands (on MLI arbitration process)
- **Treaty suspended**
 - Germany / Russia (suspended by Germany, effective 1 January 2027)

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

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