



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 31 Jul, 7, 21 & 28 Aug)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**
 - GloBE news:
 - Italy (see below)
 - Japan (see below)
 - Netherlands (see below)
 - UK (see below)
- **Tariff wars**
 - US: 50% tariff on certain Canadian imports: **21 Aug, 28 Aug**
 - US: Tariffs on imports of drones and components: **21 Aug**
 - US: IEEPA tariff refunds: **21 Aug**
 - Canada responds: **28 Aug**
- **Other global developments**
 - OECD: BEPS Action 5 peer review results on preferential tax regimes: **31 Jul**
 - OECD's Global Forum: peer review on transparency and exchange of information on request: **31 Jul**
 - OECD: Transfer pricing of intragroup services: **28 Aug**

International tax cases

- **Kern Enterprise (India) (Court allows taxpayer refund of taxes, even though taxpayer made completely different claim): 31 Jul**
- **Schoger II (ECJ) (does Austria's VAT exemption for services provided between companies in financial, insurance, and pension fund sector, breach EU State aid rules?): 31 Jul**
- **Germany / Spain treaty case (Germany) (German tax liability triggered by new Germany / Spain treaty): 31 Jul**
- **Australia / Germany treaty case (Germany) (German tax liability not triggered by new Australia / Germany treaty): 31 Jul**
- **Bay Lines (India) ("fixed place of business" PE under India / Mauritius treaty): 7 Aug**
- **QJ (ECJ) (applicability, to EU VAT, of Charter of Fundamental Rights of the EU): 7 Aug**
- **DST case (Italy) (does Italy's DST apply to direct sales by platform owner?): 28 Aug**
- **Maryland digital advertising tax cases (US) (Tax held to be invalid, for several reasons): 28 Aug**

Asia Pacific

- **Australia**
 - News Bargaining incentive: **7 Aug, 21 Aug**
 - Compensation paid to landholders in connection with renewable energy projects: **7 Aug**
 - 2 items of draft guidance on crypto-assets: **28 Aug**
- **China**
 - Tax treatment of offshore trusts: **31 Jul**
 - Exemptions from urban land use tax: **7 Aug**
 - Non-monetary asset exchanges by integrated circuit and industrial machine tools enterprises: **21 Aug**
- **Hong Kong**
 - Consultation on Corporate Treasury Centres: **31 Jul**
 - Carried interest: **21 Aug**
- **India**
 - Crypto reporting requirements: **31 Jul**
 - APA Annual Report for FY2025-26: **31 Jul**
 - Tax incentives for foreign investors: **7 Aug**
 - Limitation on state mineral taxes: **21 Aug**
 - See "International tax cases" (above)
- **Indonesia**
 - PMK-44 on tax proxies: **31 Jul**
 - E-commerce platforms: **7 Aug, 21 Aug**
- **Japan**
 - 1% consumption tax rate on food and beverages: **7 Aug**
 - GloBE rules: **21 Aug**
- **Korea**
 - 2026 tax reform proposals: **7 Aug**
 - Private use of company-owned homes: **28 Aug**
- **Malaysia**
 - Transfer pricing treatment of intra-group financing arrangements: **7 Aug**
 - Stamp duty: **21 Aug**
 - CGT exemption for disposal of shares for purpose of IPO: **21 Aug**
- **Maldives**
 - Withholding tax on non-resident contractors: **21 Aug**
- **New Zealand**
 - Income tax consequences of company amalgamation: **21 Aug**
- **Philippines**
 - Enhanced deductions regime: **7 Aug**
- **Singapore**
 - Tax incentives for funds: **21 Aug**
 - New tax measures for asset management sector: **21 Aug**
- **Vietnam**
 - 30% income tax cut for small businesses: **21 Aug**

Europe

- **Belgium**
 - Capital gains tax on financial assets: **31 Jul**
- **EU**
 - Public CbC reporting: **31 Jul**
 - CBAM: **21 Aug**
 - Tax on oil companies' windfall profits: **28 Aug**
 - See "International tax cases" (above)
- **Finland**
 - Reduction in corporate income tax rate: **28 Aug**
- **France**
 - Deadline for refund claims for withholding tax: **7 Aug**
 - E-invoicing and digital reporting regime: **7 Aug**
 - Exceptional corporate income tax surtax for large companies: **21 Aug**
- **Germany**
 - Draft Annual Tax Act 2026: **21 Aug**
 - See "International tax cases" (above)
- **Hungary**
 - Extra profit tax on oil producers: **31 Jul**
- **Ireland**
 - DAC8 reporting obligations: **28 Aug**
 - Securitisation and financing vehicles: **28 Aug**
- **Italy**
 - GloBE rules – voluntary disclosure: **31 Jul**
 - Omnibus decree: **21 Aug**
 - See "International tax cases" (above)
- **Luxembourg**
 - Mandatory B2B e-invoicing: **7 Aug**
- **Lithuania**
 - CFC rules and thin cap rules: **21 Aug**
 - 200% deduction for investment in advanced technologies: **28 Aug**
- **Netherlands**
 - Comparability of foreign entities with Dutch legal entity: **31 Jul, 7 Aug**
 - Hybrid mismatch rules: **31 Jul**
 - Foreign pension schemes: **21 Aug**
 - Penalties for GloBE rules: **21 Aug**
 - Updated decrees on corporate reorganisations: **21 Aug**
 - Double tax treaty interpretation issues: **28 Aug**
 - Estimated cost of EU's Omnibus proposal: **28 Aug**

Europe (cont'd)

- **North Macedonia**
 - E-invoicing: **28 Aug**
- **Poland**
 - 60% windfall tax: **31 Jul**
 - 3% DST: **7 Aug**
 - Corporate income tax rate to be increased: **21 Aug**
- **Portugal**
 - 33% windfall tax on oil companies: **7 Aug**
 - R&D tax incentive: **28 Aug**
- **Romania**
 - 3% tax bonus: **28 Aug**
- **Slovak Republic**
 - Minimum corporate tax: **21 Aug**
 - Financial transaction tax: **28 Aug**
- **Sweden**
 - R&D tax incentive: **21 Aug**
- **UK**
 - Changes to VAT Capital Goods Scheme: **7 Aug**
 - GloBE Information Returns: **7 Aug**
 - Short-term business visitors to UK: **21 Aug**

Africa

- **Botswana**
 - Substantial economic presence: **28 Aug**
- **Egypt**
 - Tax amendments: **21 Aug**
- **Mauritania**
 - VAT on inbound B2C digital services: **28 Aug**
- **Nigeria**
 - Taxation of virtual assets: **7 Aug**
 - Tax refunds: **7 Aug**
- **South Africa**
 - Draft amendment bill: **7 Aug**
 - E-invoicing and digital reporting: **28 Aug**

Middle East & Central Asia

- **Bahrain**
 - Updated VAT guides: **28 Aug**
- **Saudi Arabia**
 - Economic substance requirements in 4 SEZs: **21 Aug**
- **UAE**
 - Banks: 21 Aug
 - Due diligence requirements for input VAT recovery: **28 Aug**

Americas

- **Canada**
 - Draft legislation: **31 Jul**
- **Chile**
 - DEMPE analysis and intangibles: **31 Jul**
 - Tax reform package: **21 Aug**
- **Colombia**
 - Tax Reform Bill: **31 Jul**
- **US**
 - Deduction eligible income: **21 Aug**
 - CFC rules: **21 Aug, 28 Aug**
 - See "International tax cases" (above)

Treaty news

- **Treaties enter into force**
 - Belarus / Myanmar
 - Estonia / Qatar
 - Finland / France
 - China / Norway
- **Protocols signed**
 - Austria / Switzerland
 - Albania / Germany
- **Protocol enters into force**
 - France / Sweden
- **Memorandum of Understanding signed**
 - Australia / Canada (on arbitration)

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