

CFE's Tax Top 5

KEY TAX NEWS OF THE WEEK

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Code of Conduct Programme - Croatia's EU Presidency

Croatia's Presidency of the Council of the European Union set out the work programme for the Code of Conduct Group (Business Taxation) concerning the first semester of 2020. Notably, the EU 'blacklist' of non cooperative jurisdictions for tax purposes is due to be revisited at the [18 February ECOFIN Council meeting](#). Under the working programme, it is intended that the Code of Conduct group discuss a common EU position on exchange of beneficial ownership information, finalise discussions on the Foreign Source Income Exemption regimes falling within scope of the EU blacklisting process and revisit economic substance requirements by reviewing country treatment of partnerships. In order to compile a Code of Conduct Group Report before the end of Croatia's EU Presidency, the following meetings have already been scheduled: 2 March, 1 April and 3 June 2020.



OECD Opens Consultation on Country by Country Reporting

The OECD has published a [consultation document](#) inviting input concerning Action 13 of the Base Erosion and Profit Shifting Project, on Country-by-Country Reporting. The review is being carried out pursuant to the BEPS Action Plan, which mandated a review of CbCR under Action 13 in 2020.

The consultation document invites input on whether modifications should be implemented for Action 13 such that additional or different data should be reported, requesting practical experiences and issues with reporting requirements under Action 13, input on the use of the reported data by tax administrations, and on the effectiveness and appropriateness of thresholds and reporting.

The consultation will be open until 6 March 2020. Comments should be submitted in Word format to taxpublicconsultation@oecd.org.



DG TAXUD Public Consultation on Review of DAC

The European Commission, DG TAXUD has initiated an inception impact assessment looking into possibilities to strengthen the existing EU framework of exchange of information for tax purposes ("DAC"). The main issue that drives this Commission's

initiative for review of the DAC framework is the inability of tax administrations across the EU to obtain tax-related information on taxpayers who do business via the digital platform economy. According to the European Commission: “Member States' tax administrations have little information to correctly assess and control gross income (revenues) earned in their country via activities (such as renting a property via a web platform or giving a ride to a person who needs a lift and/or other cases) made via the intermediation of some digital platform which basically matches demand and supply. This is especially the case when the income or the taxable amount passes via platforms established elsewhere.”

Similarly, the [OECD report](#) of March 2019 “The Sharing and Gig Economy: Effective Taxation of Platform Sellers” looks at the approaches for taxation of income from the sale of goods or services in the sharing and gig economy, highlighting the tax challenges faced by revenue administrations in relation to emerging business models. The public consultation period runs until 6 April 2020.



EU Commission Publishes 2020 Tax Policy Report

The Commission’s DG TAXUD has [published](#) the 2020 EU tax policy survey report, examining Member States’ tax systems. The Commission in the report highlights that over the coming years, work must be done at EU and international level to “reform the international corporate tax system”, as well as “intensify the fight against tax abuse”, calling for a coordinated approach to tackling tax avoidance.

The report contains a detailed analysis of Member States’ tax systems and their performances, as well as tax reforms in the EU and in Member States, and an evaluation of the Commission’s taxation policy agenda and actions taken between 2014 and 2019, and the impact of the agenda.



FINAL REMINDER: Applications for the CFE *Albert J. Rädler* Medal Award

CFE Tax Advisers Europe, in cooperation with IBFD, reminds all tax students at Master’s level, as well as their supervisors, that the CFE receives applications from eligible tax students for the *Albert J. Rädler* Medal Award until **20 February 2020**. The award is intended to encourage academic excellence among young tax students. The Medal will be awarded at the CFE Forum, our flagship international tax conference on 2 April in Brussels.

The CFE will take care of travel and accommodation arrangements for the successful candidate to attend the CFE Forum. In addition, there is a monetary prize courtesy of the Rädler family and complimentary academic literature from our publishing partner IBFD. Applications are welcome at info@taxadviserseurope.org. More details are available on the [CFE website](#).



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