



**BRUSSELS | 23 NOVEMBER 2020**

## **G20 Summit: Stronger International Collaboration Needed**

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The G20 have called for stronger international collaboration in a number of different areas following on from an OECD report [New Horizons](#) examining structural reforms for recovery from the COVID-19 pandemic. The report was presented at the G20 Summit which took place virtually from 21 – 22 November.

In particular, the G20 has called for increased collaboration in the following fields:

- in health, from research to distributing COVID-19 vaccines,
- in trade, to ensure robust global production chains,
- in the taxation of multinationals as the economy becomes increasingly digitalised,
- in environmental sustainability, and,
- in preventing sudden outflows of capital and sovereign debt crises in emerging markets and developing countries.

Speaking at the Summit, OECD Secretary-General Angel Gurría said, *“We need to make sure health and social protection benefit all, that public and private investment is aligned with the Sustainable Development Goals, and we need to build resilience into the heart of our economic and social systems.”*

The ongoing work of the G20 on achieving a political agreement on taxation of

the digital economy was also reiterated as a priority by the OECD, with Mr Gurria stating the Inclusive Framework aims to achieve agreement by mid-2021. The EU also [emphasised](#) the commitment of G20 leaders to finding a political agreement.

## OECD Releases 2019 MAP Statistics

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The OECD has published the [2019 Mutual Agreement Procedure Statistics](#), examining the compliance of jurisdictions to implement the minimum standards on resolving treaty-related disputes, under Action 14 of BEPS. Members of the Inclusive Framework on BEPS provide annual reports of statistics concerning the resolution of disputes, in accordance with an agreed reporting framework.

The MAP statistics are now available for 82 jurisdictions, and set out detailed information for each jurisdiction, as well as aggregated information concerning all jurisdictions. The information sets out the number of existing cases, the number of new cases, the number of existing cases resolved, and the average duration of those cases. The outcomes of cases are also detailed in the statistics.

The number of transfer pricing disputes increased in 2019, with 2700 new cases, representing a 20% increase in transfer pricing cases and a 10% increase in other cases, and the number of outstanding and new disputes also increased. This was despite the fact that the statistics demonstrate that more disputes were resolved in 2019 than in 2018.

## Final Reminder: CFE Professional Affairs Virtual Conference on Taxpayers Rights - 30 November

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The 13th European Webinar Conference on Tax Advisers' Professional Affairs will be held virtually on Monday, 30 November 2020 from 3:30pm to 5pm CET, on the topic of "Taxpayer Rights and Legal Certainty in the Digital Era".

The virtual conference will welcome tax experts and academics, including Dr Philip Baker QC, prof. dr. sc. Nataša Žunić Kovačević and Paul Kraan, as well as Albert Raedler representing the European Commission. The panel will examine European and global developments in the protection of taxpayers' rights and the impact and implications of technology on taxpayers' rights. The conference will also review the recently published IBFD [2019 Yearbook on Taxpayers' Rights](#), the most recent compilation of information by the Observatory on the Protection of Taxpayers' Rights.

Register [here](#) to secure your place for the webinar.

## Forum on Harmful Tax Practices 2020 Review

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The OECD's Inclusive Framework has approved the [2020 reviews](#) of the Forum on Harmful Tax Practices. The reviews are carried out as part of the implementation of Action 5 of the OECD/G20 Base Erosion and Profit Shifting Project, concerning assessments undertaken by the Forum on Harmful Tax Practices (FHTP) of preferential tax regimes.

From the 49 regimes reviewed in 2020, jurisdictions have made legislative changes to abolish or amend 29 of the regimes, 4 regimes are now fully compliant with the BEPS Action 5 standard, 7 regimes are in the process of being amended and 2 were found not to be harmful. The 2 remaining regimes were out of scope.

In 2021, the Forum on Harmful Tax Practices will focus on the effective implementation of the standard, including the spontaneous exchange of information on activities and income of entities by parent, ultimate parent and beneficial owner jurisdictions, as well initiate monitoring to ensure no or nominal tax jurisdictions have mechanisms in place to comply with the FHTP Standard.

## Masaryk University Publishes E-Book on Czech Tax Law

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The Department of Financial Law and Economics of the Masaryk University in the Czech Republic have published a free e-book about the tax system in the Czech Republic.

This book aims to provide basic information on Czech tax law and the tax system used in the Czech Republic. It has been designed primarily for international students and LL.M. and MPA students studying tax law in the Czech Republic. Nevertheless, the author's hope is that anyone liable to tax in the Czech Republic finds here a lot of useful information. Every tax is described according to its structural components - the object of taxation, the subject liable to tax, possibilities for exemptions and the other correction components, the tax base, the tax rate, and the tax administration.

The e-book is available for download free of charge [here](#).

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