



BRUSSELS | 28 FEBRUARY 2022

EU Council Reviews Tax Blacklist

On 24 February, the Council of the EU [reviewed](#) its List of Non-Cooperative Jurisdictions for Tax Purposes ("Blacklist"). No jurisdictions were added to the list during the review.

The following jurisdictions remain on the Blacklist: American Samoa, Fiji, Guam, Palau, Panama, Samoa, Trinidad and Tobago, US Virgin Islands and Vanuatu. The state of play in Annex II of the Blacklist also details steps taken by various jurisdictions to undertake reforms in order to comply with tax good governance standards. More detail on this can be found in the Code of Conduct (Business Taxation) [report](#) to the Council of the EU.

The Blacklist is reviewed twice per year, and will next be reviewed in October 2022.

OECD Publishes Public Comments on Draft Pillar I Nexus & Revenue Sourcing Rules

The OECD has published the [public input](#) received on the first consultation process conducted concerning [Draft Rules for Nexus and Revenue Sourcing](#) from the Pillar 1 solution to address the tax challenges arising from digitalisation and globalisation of the economy. This consultation concerns Amount A of Pillar 1.

The revenue sourcing rules will allow in-scope MNEs to identify the relevant market jurisdictions from which revenue is derived, and to apply the revenue-based allocation key. Under the OECD [agreement](#) reached in October 2021, revenue is sourced to the end market jurisdictions where goods or services are used or consumed.

Further consultations will be conducted in the coming months on the 14 building blocks which make up Pillar 1

Applications Open: CFE Tax Advisers Europe's 2021 Albert J. Raedler Medal Award

Submissions are now invited for CFE's 2021 *Albert J. Rädler Medal Award*. The award was established in 2013 in order to encourage and reward academic excellence in European taxation, as well as to recognise Professor Albert J. Rädler's esteemed contribution to the field of taxation within Europe. In order to be eligible to apply, an applicant must have completed a Master's thesis in European taxation which received a distinction in the relevant calendar year, and be 30 years or under on the 31st December of that relevant year. The thesis should be written in English or, in the alternative, an English translation must be provided.

The successful applicant will be awarded with the medal at an Award Ceremony which will take place at the CFE Forum on 12 May 2022 in Brussels, Belgium. In addition to the Albert J. Rädler medal itself, the recipient will be offered travel costs in order to attend the 2022 CFE Forum, as well as a selection of premium technical literature from our partner IBFD.

Please send the applications until 18 March 2022 to the attention of Ms. Karima Baakil via email at: info@taxadviserseurope.org.

OECD Consultation on Draft Rules for Tax Base Determination Under Pillar I

The OECD continues to seek input on the [Draft Model Rules for Tax Base Determinations](#), the second consultation concerning the computation of Amount A under the Pillar 1 solution to address the tax challenges arising from digitalisation and globalisation of the economy.

As stated in the OECD consultation, the purpose of the tax base determinations rules is to establish the profit (or loss) of an in-scope MNE that will be used for the Amount A calculations to reallocate a portion of its profits to market jurisdictions. The rules determine that profit (or loss) will be calculated on the basis of the consolidated group financial accounts, while making a limited number of book-to-tax adjustments. The rules also include provisions for the carry-forward of losses.

Those who wish to provide feedback can submit comments until 4 March 2022 electronically in Word format by email to tfde@oecd.org, addressed to: Tax Treaties, Transfer Pricing and Financial Transactions Division OECD/CTPA.

Investment Tax Incentives Database

Following on from the creation of an online database which compiles information on corporate income tax (CIT) incentives for investment, the OECD has now published a paper setting out the methodology employed for the development of the database and on initial data collected using the database from 36 developing countries.

According to the OECD, "the data reveal that tax exemptions are the most widely used CIT instrument across the 36 countries and identifies notable differences between the incentives used within and outside of Special Economic Zones (SEZs). In 80% of countries covered, at least one tax incentive supports an area related to the Sustainable Development Goals".

The report can be accessed [here](#).

The selection of the remitted material has been prepared by:
Piergiorgio Valente/ Aleksandar Ivanovski/ Brodie McIntosh/ Filipa Correia