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Commission Launches Call for Evidence on Corporate Tax "Omnibus" Simplification

The European Commission has launched a [Call for Evidence](#) on the forthcoming taxation Omnibus legislative proposal, expected to be published in late June 2026. The initiative forms part of the EU's tax decluttering and competitiveness agenda and aims to streamline, clarify and enhance several core EU direct tax directives without altering their underlying policy objectives.

The review will cover targeted amendments to the Anti-Tax Avoidance Directive, including the Interest Limitation Rule, Controlled Foreign Company rules and the General Anti-Abuse Rule. The Commission in the Call for Evidence has identified potential overlap between CFC rules and the OECD/G20 Global Minimum Tax in Pillar Two, as well as concerns regarding the functioning of the EBITDA-based ILR in the current economic environment of higher interest rates and inflation. Simplification options may therefore address duplication, procyclical effects and divergent national implementation.

In addition, the Parent-Subsidiary Directive, Interest and Royalties Directive, Tax Merger Directive and Tax Dispute Resolution Mechanisms Directive are in scope. The Commission notes that flexibility in transposition has led to fragmentation, legal uncertainty and administrative burden. Differences in holding thresholds, definitions of qualifying entities, withholding tax relief procedures and anti-abuse concepts have been identified as areas where alignment and clarification may be required.

The consultation also highlights procedural barriers in accessing directive benefits and in the operation of the dispute resolution framework, including interpretative divergences concerning the admission of cases. The Commission has indicated that the initiative is intended to reduce administrative burden, eliminate outdated or overlapping provisions and improve coherence across the EU direct tax acquis,

while remaining tax neutral and preserving safeguards against aggressive tax planning.

Stakeholders are invited to submit evidence on compliance costs, burdensome procedures and inconsistencies in application. The feedback will inform the preparation of the legislative proposal scheduled for 2026, and can be submitted via the [Have Your Say](#) portal until 16 March 2026.

OECD Releases Amount B FAQs & Updates Pricing Automation Tool

Last week, the OECD published a set of [Frequently Asked Questions](#) providing technical clarifications on the application of the simplified and streamlined approach under Amount B. The FAQs address practical implementation issues arising from early application of the rules, including confirmation that the accounts payable guardrail should not be recomputed following retrospective Cost of Goods Sold adjustments, clarification that the +/- 0.5% range in the pricing matrix does not reapply after adjustments under the operating expense cross-check or data availability mechanism, and guidance on the annual testing of the accounts payable guardrail. The document also clarifies the treatment of inter-company debtors and creditors in working capital calculations, the application of the rules to start-ups with limited historical data, and the interpretation of “mixed products” and certain industry grouping definitions.

Alongside the FAQs, the OECD also released the 2026 revision of the [Amount B Pricing Automation Tool](#). The tool is designed to automatically compute the Amount B return for an in-scope tested party based on limited data inputs, supporting consistent application of the pricing matrix, operating expense cross-check and, where relevant, the data availability mechanism. The tool is intended to further optimise the administrative and simplification benefits of Amount B for both tax administrations and taxpayers and will be updated annually to reflect any changes to the pricing matrix and other relevant datapoints.

ECOFIN Updates EU Tax Blacklist & Sets 2027 Budget Guidelines

At its meeting of 17 February 2026, the Economic and Financial Affairs Council adopted conclusions [updating the EU list of non-cooperative jurisdictions for tax purposes](#). Two jurisdictions, Turks and Caicos Islands and Vietnam, were added to Annex I of the list. Turks and Caicos Islands were listed following concerns raised by the OECD Forum on Harmful Tax Practices regarding the enforcement of economic

substance requirements, while Vietnam was added after a review by the OECD Global Forum concluded that it did not meet the required standards for exchange of information on request.

At the same time, Fiji, Samoa and Trinidad and Tobago were removed from the list, having brought their frameworks into line with agreed international tax standards. Following the revision, the EU list now comprises ten jurisdictions: American Samoa, Anguilla, Guam, Palau, Panama, Russia, Turks and Caicos Islands, US Virgin Islands, Vanuatu and Vietnam. The entries for American Samoa, Guam and the US Virgin Islands were updated to reflect progress made, although this was not considered sufficient for removal.

In addition, the Council approved the updated Annex II state-of-play document, recognising ongoing cooperation with jurisdictions that have committed to reforms. Antigua and Barbuda and Seychelles were removed from Annex II after receiving positive ratings from the OECD Global Forum in respect of exchange of information on request. Brunei was granted a six-month extension to reform its foreign-source income exemption regime.

Ministers also [approved conclusions](#) setting out guidelines for the EU's annual budget for 2027, the final year of the current Multiannual Financial Framework (2021–2027). The Council underlined the need for a realistic and prudent budget, maintaining sufficient margins under the MFF ceilings to address unforeseen circumstances, while ensuring adequate resources for Union programmes and continued solidarity with Ukraine. The Commission was invited to identify necessary redeployments to finance priorities under the revised MFF and to take account of arrangements concerning NextGenerationEU interest payments where these cannot be covered under existing budget lines.

EU AML Authority Launches Consultation on Standards for Framework

The EU Authority for Anti-Money Laundering and Countering the Financing of Terrorism, AMLA, has launched three [public consultations](#) on draft Regulatory Technical Standards under the new EU Anti-Money Laundering framework.

The consultations concern customer due diligence requirements, criteria for identifying business relationships, occasional and linked transactions, and indicators and methodology for pecuniary sanctions and periodic penalty

payments. The measures form part of the implementation of the revised EU AML legislative package, which will apply from 10 July 2027.

The draft due diligence standards will specify in detail how obliged entities must identify and verify customers and beneficial owners, and how ongoing monitoring should be conducted. The business relationship standards determine when AML obligations are triggered, including the treatment of recurring engagements and linked transactions. Together, these instruments will define the practical compliance framework applicable to non-financial obliged entities, including tax advisers.

The sanctions standards establish indicators for classifying the gravity of breaches and criteria for setting pecuniary sanctions, with the aim of promoting supervisory convergence and consistent enforcement across Member States. For the tax profession, this framework will shape both the scope of operational AML obligations and the categorisation of compliance deficiencies.

The sanctions consultation closes on 9 March 2026, and the customer due diligence and business relationship consultations close on 8 May 2026. As set out in AMLA's 2026–2028 Single Programming Document, these RTS form part of a broader package of technical standards to be finalised in 2026, ahead of the application of the new AML regime in July 2027. Input can be provided via the [AMLA Consultation webpage](#).

FISC to Examine Equity-Debt Bias, Financial Sector Taxation & 28th Regime

Tomorrow, on 24 February 2026, the European Parliament's Subcommittee on Tax Matters (FISC) will meet in Brussels. The meeting will begin with a public hearing on the topic of *"How to address the Equity-Debt Bias in Taxation?"*. Speakers, including Prof. Michael Devereux, Ms. Tove Maria Ryding and Mr. Paolo Ludovici, will discuss the structural preference for debt over equity in corporate taxation, its effects on investment and financial stability, and the effectiveness of existing measures such as interest limitation rules. The debate will also consider lessons from past tax planning practices and the interaction with ongoing EU corporate tax reforms.

FISC will then consider the draft own-initiative report on *"A coherent tax framework for the EU's financial sector"*, to be presented by rapporteur Matthias Ecke (S&D). The draft addresses fragmentation in the sector, the VAT exemption for financial services and the proliferation of national sector-specific taxes. It also recalls

Parliament's support for an EU-wide Financial Transaction Tax, in the context of the Commission's announced withdrawal of its 2013 FTT proposal.

Members will then hold a second public hearing to close the meeting, on the topic of *"Feasibility of a 28th tax regime and its potential to support EU competitiveness"*. Speakers, including Prof. Reinhilde Veugelers, Dr. Apostolos Thomadakis and Mr. Michael Schick, will examine how tax elements could be integrated into a possible 28th regime for EU companies to reduce cross-border barriers and strengthen the Single Market.

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