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# Americas Tax Roundup

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## Latest news – Americas

### [COVID-19 relief measures continue throughout Americas](#)

Jurisdictions throughout the region continue to announce new and expanded measures to respond to the COVID-19 pandemic. The list below may not include the very latest developments.

### [US passes interim coronavirus relief package; releases guidance for foreign businesses and nonresident aliens affected by travel disruptions; issues guidance implementing CARES Act provisions; and announces relief for importers](#)

Significant recent COVID-related developments in the US include:

- ▶ The US Congress has passed a \$484 billion interim coronavirus relief measure that will provide an additional \$310 billion for the Paycheck Protection Program (PPP), as well as funding for disaster loans, health care provider relief, and coronavirus testing.
- ▶ The Internal Revenue Service (IRS) has published guidance providing relief for certain US business activities conducted by a nonresident alien or foreign corporation when the activities were only conducted in the US due to COVID-19-related travel disruptions.
- ▶ The IRS has released important procedural rules specific to the implementation of the Coronavirus Aid, Relief, and Economic Security (CARES) Act provisions for qualified improvement property (QIP) that, coupled with various additional provisions, provide taxpayers with a significant opportunity to reevaluate their current and prior tax positions and implement various cash tax planning strategies.
- ▶ The US has announced that it will provide import payment deferral on certain imports to importers facing a significant financial hardship as a result of COVID-19.

### [Canada updates Canada Emergency Response Benefit and Federal Economic Response Plan](#)

The Canadian government has announced changes to the Canada Emergency Response Benefit, which was created to support Canadians whose income has been adversely affected by the COVID-19 emergency. The changes broaden the eligibility requirement, allowing more Canadians to access the support measure. In addition, the Canada Revenue Agency released an update regarding Federal Economic Response Plan tax administration measures.

### [Colombia issues additional COVID-19 tax measures](#)

Colombia has established additional tax measures to ease the burden on taxpayers in light of the COVID-19 pandemic. Certain tax return filing and tax payment deadlines are extended. Additionally, the government established a 0% value-added tax (VAT) rate for certain goods and a new “solidarity” tax applicable to certain taxpayers.

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### [Ecuador's National Assembly to consider proposed measures to safeguard employment and to create a new tax to increase funding to combat COVID-19](#)

Ecuador's President has submitted a bill to Ecuador's National Assembly to safeguard employment, which has been affected by the COVID-19 pandemic. The bill would allow companies to enter into agreements with employees to meet the company's incidental needs, reduce work hours, or grant advanced annual leave. The President also submitted a bill to establish a new tax on certain profits to fund humanitarian support in light of COVID-19.

### [Uruguay establishes 'COVID-19 Solidarity Fund' and 'COVID-19 Sanitary Emergency Tax' and allows tax-free imports and exports of certain products](#)

Uruguay has enacted a law creating the "COVID-19 Solidarity Fund," which is to be funded by a new tax called the "COVID-19 Sanitary Emergency Tax." The new tax applies to income received by individuals performing services for the government under a contract. In addition, Uruguay's Ministry of Economy and Finance has established that certain products previously considered essential by the Ministry of Public Health can be imported into or exported from Uruguay permanently or temporarily without the imposition of taxes.

### [EY COVID-19 tracker tools provide global legislative, force majeure, labor/employment, mobility, immigration, tax controversy and trade/customs resources](#)

EY has several tools to help businesses track the myriad legislative and regulatory changes spurred by the COVID-19 pandemic, including the EY global tax policy and stimulus tracker, as well as specialized tracker tools focused on COVID-19 implications for force majeure law, labor and employment law, mobility, immigration policy, tax controversy, (NEW!) trade and customs, and (NEW!) US state and local taxes.

### [Argentina modifies informative regime requiring local entities and individuals to report further information on foreign entities](#)

The Argentine tax authorities have modified the annual informative regime under which local entities must provide certain information on their shareholders (or equivalents), related entities, and other participations, as applicable, and individuals must report foreign participations, if any. Local entities now must report on an annual basis the "final beneficiary" of their shareholders (or equivalents), and local entities and individuals to report foreign entities that obtain passive income in which they have interests.

### [Costa Rica's Ministry of Foreign Trade requests comments on draft authorized exporter regulations](#)

Costa Rica's Ministry of Foreign Trade has requested comments on the draft regulations for granting authorized exporter status under certain treaties and trade agreements in force in Costa Rica. The draft regulations would establish the procedure for exporters to obtain authorized exporter status.

### [US taxpayer considerations of OECD's recent transfer-pricing guidance on financial transactions](#)

A recent report from the OECD contains critical guidance for multinational enterprises and tax authorities on applying the arm's-length standard to controlled financial transactions. A new EY US Tax Alert provides a brief overview and summarizes the most critical areas of the report for US taxpayers and their relevance in the context of US transfer pricing issues.

### [US IRS releases FAQs on transfer pricing documentation best practices](#)

The US IRS has published new frequently asked questions (FAQs) describing best practices and common mistakes in preparing transfer pricing documentation. The guidance is designed to encourage and help taxpayers to prepare improved documentation with an aim to decrease the number of issues selected for examination and improve examination efficiency for the issues that are selected.



### [Canada to increase processing fees for Permanent Residency applications](#)

Immigration Refugees and Citizenship Canada (IRCC) is increasing the processing fees on 30 April at 9:00 AM EDT for foreign nationals seeking to become permanent residents. Completed applications received before that time will be processed in accordance with the fee schedule in place prior to 30 April.

### [EY's 'Latest on BEPS and Beyond' for April 2020](#)

EY's Latest on BEPS and Beyond monthly newsletter reviews global and regional BEPS-related policy trends, as well as recent BEPS-driven developments in individual countries. Among other developments, the April 2020 edition highlights a G20 Finance Ministers and Central Bank Governors communique that emphasizes the urgent priority to overcome the COVID-19 pandemic and an attached action plan for international economic cooperation through the crisis.

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## Upcoming webcasts

### [Global tax policy in response to COVID-19 – an update for businesses \(28 April\)](#)

In the second in a series of discussions on the tax and economic policy actions governments around the globe are taking in response to the COVID-19 crisis, our panelists will discuss: (1) the latest developments, (2) how these developments are impacting the global economy, (3) implications for tax controversy, and (4) steps businesses can take now.

### [BEPS 2.0 in the context of COVID-19 \(30 April\)](#)

Amid the disruption brought by the COVID-19 pandemic, companies continue to assess the implications of the OECD "BEPS 2.0" project. In this webcast, the panelists will review the Secretariat proposal for Pillar One, as well as the broader potential impact of COVID-19 on BEPS 2.0.

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## This week's EY Global Tax Alerts

### COVID-19 | Key Alerts and other resources from EY's Global Tax

Global Tax Alerts were issued this week with updated COVID-19 news, covering the following jurisdictions: Australia, Botswana, Canada, Colombia, Costa Rica, Ecuador, France, Gabon, Ireland, Philippines, Portugal, Poland, Tukey, the United States, Uruguay and Zambia. Access the Alerts and other COVID-19 related materials [here](#).

### Additional Global Tax Alerts

- ▶ [Report on recent US international tax developments – 24 April 2020](#)
- ▶ [Latvia passes regulations to implement Mandatory Disclosure Rules](#)
- ▶ [Argentina modifies informative regime requiring local entities and individuals to report further information on foreign entities](#)
- ▶ [US IRS releases FAQs on transfer pricing documentation best practices](#)
- ▶ [Bahrain issues guidance on Mutual Agreement Procedure](#)

### Transfer Pricing Alerts

- ▶ [Gabon postpones transfer pricing documentation filing deadline](#)
- ▶ [US IRS releases FAQs on transfer pricing documentation best practices](#)



## OECD Alerts

- ▶ [OECD releases Sweden Stage 2 peer review report on implementation of Action 14 minimum standard](#)
- ▶ [Portugal deposits its instrument of ratification of the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS](#)

## Indirect Alerts

- ▶ [Spanish Central Tax Court issues resolution on services between head offices and branches](#)

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## EY Industry and Tax Services publications

### Industries

#### Financial Services

- ▶ [As uncertainty increases, how can third-party risk management evolve?](#)

#### Real Estate, Hospitality & Construction

- ▶ [Webcast replay: How COVID-19 is impacting Real Estate Investment Trusts](#)

#### Technology, Media & Entertainment, and Telecommunications

- ▶ [When your customers change how they buy, shouldn't you change how you sell?](#)

### Services

#### Advisory

- ▶ [COVID-19: Three considerations for marketing and brands](#)
- ▶ [Seven ways to keep ahead of cyber attackers during COVID-19](#)

#### Assurance

- ▶ [How boards can enhance corporate finance oversight in uncertain times](#)
- ▶ [What audit committees need to consider in the face of uncertainty](#)
- ▶ [How to oversee cybersecurity risk in a growing virtual work environment](#)

#### People and workforce

- ▶ [How to navigate the greatest workplace change challenge in a generation](#)
- ▶ [How leaders can protect employee wellbeing during COVID-19](#)
- ▶ [Five leadership behaviors for all of us during COVID-19](#)
- ▶ [How long-term value fits into the short-term COVID-19 imperative](#)
- ▶ [COVID-19: How firms can protect their workforce, operations and values](#)
- ▶ [How to get your agile transformation on target](#)

#### Tax

- ▶ [How governments are using tax to help economies affected by COVID-19](#)
- ▶ [Five tax moves businesses should consider as COVID-19 affects the global economy](#)
- ▶ [Beyond COVID-19: Why agile tax operations are critical to recovery](#)



## Comments

If you have any questions or suggestions about this newsletter, please email Global Tax News Update Help at: [globaltaxnewsupdatehelp@ey.com](mailto:globaltaxnewsupdatehelp@ey.com).

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