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1 June 2020

Americas Tax Roundup

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.

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[Global Tax Guides app](#)
Access tax technical data on 150+ jurisdictions from your iPad® anywhere in the world. [Download the guides here.](#)

[Costa Rica establishes pilot program with Panama to allow international drivers to transport goods between those countries](#)

Costa Rica has established a pilot program with Panama to allow international drivers to transport goods between both countries. The new decree allows international drivers that transport goods by land, air, and sea to enter Costa Rica, but they must follow the mandatory health order and all guidelines issued by the Ministry of Health to stop the spread of COVID-19.

[Canada Revenue Agency releases update on personal tax return filing deadline](#)

The Canada Revenue Agency (CRA) has released an update on the personal tax return (T1) filing deadline and the application of late-filing penalties. In particular, the CRA has announced that late-filing penalties will not apply to any 2019 T1 return filed by 1 September 2020, provided the related tax balance is also paid by 1 September 2020. The CRA also announced that the filing deadline for corporate and trust income tax returns due in June, July, and August 2020 will be extended to 1 September 2020.

[New Transfer Pricing COVID-19 Response Tracker joins EY suite of COVID-19 Trackers](#)

Changes to transfer pricing policy and procedures around the world are being proposed and implemented daily in response to the ongoing COVID-19 crisis. Our new EY COVID-19 Transfer Pricing Tracker provides a snapshot of changes that have been announced in countries around the world. The Transfer Pricing tracker joins our existing suite of COVID-19 Response Trackers, including: [Tax Stimulus Tracker](#) | [Force Majeure](#) | [Global Mobility](#) | [Global Trade Considerations](#) | [Immigration Policy](#) | [Labor and Employment Law](#) | [Tax Controversy](#) | [US State and Local Taxes](#).

[Argentina issues long-awaited transfer pricing regulations](#)

The Argentine Federal Tax Authorities have issued long-awaited regulations implementing the transfer pricing provisions enacted as part of the tax reform in December 2017. These rules mainly cover transfer pricing compliance obligations for fiscal years ended December 2018 and onwards (including due dates and the creation of new returns). For companies doing business in Argentina, time is of the essence. While the regulations extended the due dates for filing the transfer pricing report and master file, the new due dates are fast approaching.



[US announces that references to NAFTA in US income tax treaties should be interpreted as references to USMCA](#)

The US Treasury Department and the Internal Revenue Service have announced that, once the Protocol Replacing the North American Free Trade Agreement with the Agreement between the United States of America, the United Mexican States, and Canada (USMCA) enters into force, they will interpret references in US income tax treaties to the North American Free Trade Agreement (NAFTA) as references to the USMCA. The announcement provides helpful guidance for interpreting the US tax treaties that explicitly refer to the NAFTA.

[Costa Rica is invited to become the 38th member of the OECD](#)

The OECD has announced that Costa Rica has formally been invited to become the 38th member of the OECD after the completion of the accession process. Costa Rica will be the fourth country from Latin America to join the OECD, following Chile, Mexico, and Colombia. Taxpayers should expect Costa Rica to further align its legislation with OECD guidelines in the future.

[‘M&A Tax Highlights: 2020 Guide to Latin America’](#)

Mergers and acquisitions (M&A) tax rules and regulations in Latin America continue to grow in number and complexity. EY’s M&A Tax Highlights: 2020 Guide to Latin America provides at-a-glance M&A tax highlights for eight major Latin American jurisdictions: Argentina, Brazil, Chile, Colombia, Mexico, Panama, Peru, and Venezuela.

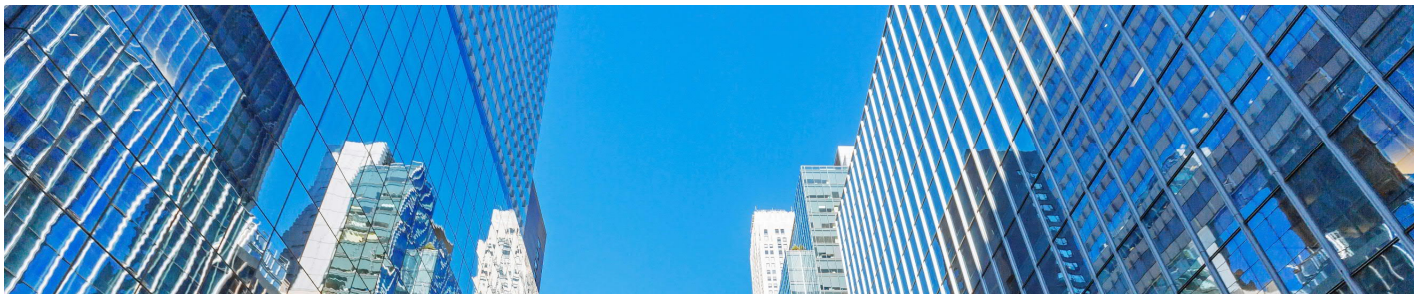
This week’s tax treaty news in the Americas

- ▶ Argentina and Japan: Japanese parliament approved tax treaty
- ▶ Jamaica and Japan: Japanese parliament approved tax treaty
- ▶ Peru and Japan: Japanese parliament approved tax treaty
- ▶ Uruguay and Japan: Japanese parliament approved tax treaty

Upcoming webcasts

[COVID-19: Beyond headline legal, people, and trade stimulus measures \(2 June\)](#)

Businesses are now looking beyond headline stimulus measures to ensure they are availing themselves of all government policies designed to provide support for business during this time. In this webcast, panelists from EY Law, People Advisory Services, Trade, and Transfer Pricing will discuss various actions that governments around the globe are taking in response to COVID-19 and how corporate entities are responding.



Recently archived webcasts now available on-demand

[Tax in a disrupted market: Update on major foreign tax developments \(5 May\)](#)

This webcast covered tax-related COVID-19 stimulus measures around the globe and other key recent foreign tax legislative developments and proposals. The panelists included representatives from the EY Global Tax Desk Network covering perspectives from Europe, Latin America, and Asia Pacific.

[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 reviewed the Secretariat proposal for Pillar One, as well as the broader potential impact of COVID-19 on BEPS 2.0.

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: Austria, Canada, Costa Rica, Denmark, the European Union, India, Italy, Israel, the Netherlands, Panama, Rwanda, Turkey, the UK and the US. Access the Alerts and other COVID-19 related materials [here](#).

Additional Global Tax Alerts

- ▶ [Report on recent US international tax developments - 29 May 2020](#)
- ▶ [US Treasury and IRS announce that references to NAFTA in US income tax treaties should be interpreted as references to USMCA](#)
- ▶ [The Czech Republic deposits its instrument of ratification of the MLI](#)
- ▶ [OECD releases Liechtenstein Stage 2 peer review report on implementation of Action 14 minimum standard](#)
- ▶ [CJEU rules Luxembourg’s fiscal unity regime infringes EU law](#)
- ▶ [Namibia issues 2020 Budget](#)
- ▶ [Spain sends MDR bill to Parliament for approval](#)

Transfer Pricing Alerts

- ▶ [Argentina issues long-awaited transfer pricing regulations](#)
- ▶ [India Tax Administration extends applicability of transfer pricing safe harbor rules to financial year 2019-20](#)

Indirect Alerts

- ▶ [Brexit: Business considerations to prepare for UK exit and trade between the UK and EU](#)
- ▶ [Italy enacts “Relaunch Decree” to manage COVID-19 crisis: Indirect tax implications](#)
- ▶ [Saudi Arabia announces transitional rules for VAT rate increase](#)

Human Capital Alerts

- ▶ [Updated COVID-19: Israel’s Ministry of Economy provides temporary procedure for urgent business needs](#)



EY Industry and Tax Services publications

Industries

Consumer Products & Retail

- ▶ [Are you agile enough to move with the changing consumer?](#)
- ▶ [Future Consumer Index: How to serve the 'Anxious Consumer' after COVID-19](#)

Government & Public Sector

- ▶ [How far can you flex in the wind while keeping your roots secure?](#)

Oil & Gas

- ▶ [How oilfield services companies can build a returns-focused culture](#)
- ▶ [Market conditions reshape business and M&A strategies in oil and gas](#)
- ▶ [What Q1 2020 earnings calls reveal about the oil and gas demand plunge](#)

Health

- ▶ [How telehealth is helping address the challenges of COVID-19](#)

Services

People and workforce

- ▶ [COVID-19: Which critical choices should businesses make next?](#)
- ▶ [How can Europe reset the investment agenda now to rebuild its future?](#)

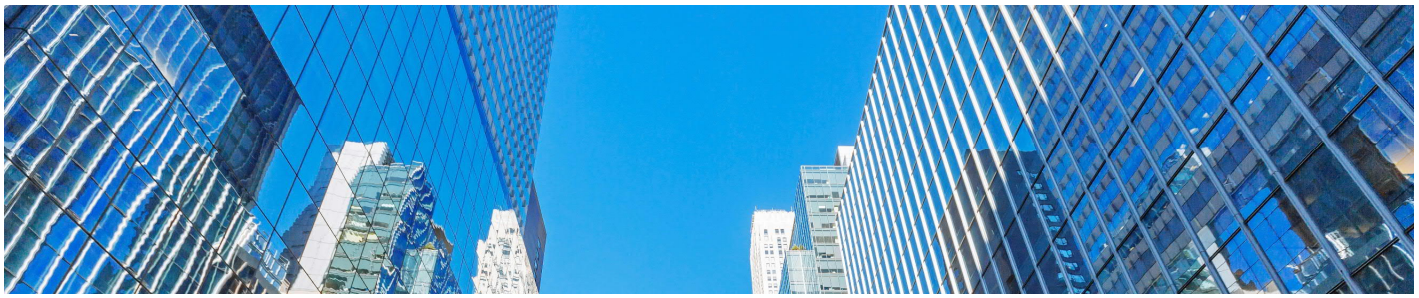
Issues

Risk

- ▶ [How the NIST Privacy Framework can help you better manage risk](#)
- ▶ [How can data help you manage the rapidly changing landscape of risk?](#)
- ▶ [How to manage political risk in a post-pandemic world](#)

Comments

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