

# Americas Tax Roundup

#### Latest news – Americas

#### Panama remains on EU list of non-cooperative jurisdictions with no immediate consequences

The Council of the European Union updated the EU list of non-cooperative jurisdictions for tax purposes and kept Panama on the list. Although Panama remains on the EU list, there are no immediate consequences for Panama. Provided no defensive measures are taken against Panama, the treatment of corporate structures including Panama and the application of double tax treaties signed with EU Member States will remain the same.

#### Canada: British Columbia's expanded Provincial Sales Tax registration requirements to take effect on 1 April

British Columbia (BC) announced that 1 April 2021 is the effective date for the implementation of the expanded Provincial Sales Tax (PST) registration requirements. The original implementation date was 1 July 2020. Under the new registration requirements, Canadian providers of goods, along with Canadian and foreign providers of software and telecommunication services, must register as tax collectors and collect PST at 7% from customers located in BC if their BC gross revenue exceeds the set threshold of CAD \$10,000.

#### EY Canada releases latest issue of TaxMatters@EY

TaxMatters@EY, a monthly bulletin prepared by EY Canada, provides a summary of recent Canadian tax news, publications, and resources. Highlights of the March 2021 issue include: (1) the impact of COVID-19 relief on Canadian snowbirds and travelers to the United States, and (2) a recent Federal Court of Appeal decision that found while a taxpayer may have committed carelessness or neglect, that does not necessarily rise to the level of gross negligence.

## Will governments return to the past or nurture a digital future? – EY article addresses how governments can continue to embrace digital technologies

The COVID-19 pandemic demonstrated a previously untapped ability by governments to innovate and deliver at speed when the urgency and political support is present. We saw a dramatic acceleration in digital service delivery and interactions with citizens across many areas of government, from health care and social services to education and justice. The public sector has rapidly embraced digital technologies during the COVID-19 pandemic. Learn how governments can continue the momentum in this article.

## This week's tax treaty news in the Americas

- Canada and Switzerland: amending protocol to income and capital tax treaty initialed
- Chile and Romania: social security agreement signed
- Chile, G20, and OECD: Multilateral Convention entered into force
- Panama, G20, and OECD: Multilateral Convention entered into force



## Upcoming webcasts

#### Latin America 'nearshoring' webcast series: Costa Rica session (16 March)

Recent disruptions to global supply chains have heightened interest in the concept of "nearshoring" (i.e., the transferring of a business operation to a nearby country from a more distant one). To provide information and help answer questions about nearshoring in Latin America, EY is sponsoring a series of webcasts featuring our local country professionals. This latest session in the series will focus on Costa Rica.

## Recently archived webcasts

#### The outlook for global tax policy and controversy in 2021

A panel of EY tax policy and controversy leaders discussed the findings reported in the upcoming EY 2021 Tax Policy & Controversy Outlook, focusing on the most significant tax law and administration trends and highlighting leading practices for companies as they navigate tax developments around the world in the year ahead.

## Recently issued EY podcasts

#### US Cross-Border Taxation weekly podcast, 5 March 2021

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include:

- US Senate considers \$1.9 trillion COVID relief package
- US Treasury Secretary takes Pillar 1 safe harbor off table in BEPS 2.0 talks
- Murillo named Treasury Deputy Assistant Secretary for International Tax Affairs

You can register for this weekly podcast on iTunes here.

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#### Monthly ITTS Washington Dispatch (February 2021)

EY's monthly Washington Dispatch podcast summarizes recent developments in US international taxation. Highlights of this month's edition include:

- Congress poised to enact \$1.9t COVID relief bill with repeal of worldwide interest expense allocation
- Treasury to consider reviving expired transfer pricing aggregation regulations
- ▶ IRS continues APA/MAP case closures despite COVID restrictions
- OECD FTA releases new handbook for ICAP
- OECD holds public consultation on review of BEPS Action 14 minimum standard on dispute resolution
- OECD releases 10th batch of peer review reports on BEPS Action 14

The Newsletter PDF is available here.

You can register for this monthly podcast on iTunes here.



#### This week's EY Global Tax Alerts

#### Global Tax Alerts

- Report on recent US international tax developments 5 March 2021
- Brazilian Senate approves three new treaties for the avoidance of double taxation
- Peru establishes gains from indirect transfer of Peruvian shares will be taxed only in Chile under Peru-Chile DTT
- Canada: Alberta issues budget 2021-22
- Panama remains on EU list of non-cooperative jurisdictions with no immediate consequences
- Indian Supreme Court rules on taxability of software payments
- ► Singapore updates guidance on tax residence status and determination of a permanent establishment due to COVID-19
- UK issues 2021 Budget: Initial highlights

#### **OECD Alerts**

- OECD issues report to G20 finance ministers and Central Bank governors and hosts webcast on the outcomes of the G20 meeting and other tax developments
- OECD releases Kazakhstan Stage 1 peer review report on implementation of Action 14 minimum standard
- OECD releases Bahrain Stage 1 peer review report on implementation of Action 14 minimum standard

#### Transfer Pricing Alerts

- ▶ The Netherlands starts consultation on unilaterally addressing transfer pricing mismatches
- Irish Revenue issues guidance on transfer pricing legislation
- Philippines provides guidelines and procedures for transfer pricing reporting

#### **Human Capital Alerts**

- Canada's International Experience Canada programs now open for 2021
- UK Budget 2021 discussed
- Hong Kong's 2021/22 Budget proposal discussed

#### **Indirect Tax Alerts**

- US Court of International Trade Decision questions first sale principle applicability to Chinese- and Vietnameseorigin goods
- Canada: British Columbia's expanded Provincial Sales Tax registration requirements to take effect on 1 April 2021



## EY Industry and Tax Services publications

#### **Industries**

#### Automotive

► How to build a more agile, networked supply chain

### Banking & Capital Markets

Using AI to augment pricing intelligence for banks

#### Consumer Products & Retail

► The CEO Imperative: Accelerate to get ahead of the changing consumer

#### **Private Equity**

Why private equity firms should be embedding ESG in their portfolio

#### Technology

► Tech Horizon: Six habits of digital transformation leaders

#### **Financial Services**

► How the CFO and CIO collaborate to create, optimize and protect value

#### Services

#### People and workforce

Updated! EY's Global COVID-19 Immigration Tracker and EY's PAS Mobility Tracker

#### Tax

Why companies should pay attention to climate change proposals

#### Comments

If you have any questions or suggestions about this newsletter, please email Global Tax News Update Help at: <a href="mailto:globaltaxnewsupdatehelp@ey.com">globaltaxnewsupdatehelp@ey.com</a>.



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