

Americas Tax Roundup

Latest news – Americas

[EY provides detailed overview of OECD's Progress Report on Amount A of Pillar One of BEPS 2.0 project](#)

EY has reviewed the OECD Secretariat's release of a *Progress Report on Amount A of Pillar One* (the [Progress Report](#)) in connection with the ongoing OECD/G20 BEPS 2.0 project. The Progress Report is a consultation document that covers many of the building blocks with respect to the new taxing right under Pillar One Amount A and is presented in the form of domestic model rules. Comments on the overall design of the Amount A rules reflected in the Progress Report are due by 19 August 2022. Affected companies may want to consider taking the opportunity to engage with the OECD and country policymakers through the consultation process.

[Costa Rica's Government publishes regulations to implement the Digital Nomads Law](#)

Costa Rica's Government published regulations to implement the Digital Nomads Law (Law No. 10.008), which established rules for foreigners who are authorized to enter and stay in Costa Rica under the migratory category of nonresident, subcategory of stay worker or remote service provider. The regulations set out the immigration procedure remote workers or service providers must follow, as well as the procedure for obtaining the tax benefits under Law 10.008, which include corporate income tax and import tax exemptions.

[Uruguay's Executive Power presents accountability bill for 2021 to Parliament](#)

On 30 June 2022, Uruguay's Executive Power presented to the Parliament the national accountability bill for 2021. The bill would reduce tax rates on certain interest income and exempt interest income from nonresident income tax in certain circumstances. The proposed tax measures would be effective 1 January 2023. Taxpayers should analyze their operations to determine the effect, if any, the bill might have on their business.

[Uruguay's Administrative Contentious Court strikes down portion of decree regulating free trade zones](#)

With this ruling, companies that operate in free trade zones, but are allowed to carry out complementary activities outside of free trade zones, are prohibited from promising to sell goods and services outside of free trade zones. Companies may be able to enter into a preliminary contract for the sale of goods and services in non-free trade zone territory, however.

[EY Canada issues latest edition 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 July 2022 issue include: (i) tax issues related to vacation properties, and (ii) EY's updated tax calculators and rates.

[PE Watch: Latest developments and trends, July 2022](#)

The latest edition of EY's PE Watch is available, among other things providing an update on a recent Tax Court of Canada decision on the definition of service permanent establishment (PE) in the Canada-US tax treaty and Costa Rica's new rules to calculate taxable income of a PE providing international transport.



This week's tax treaty news in the Americas

- ▶ Brazil and Austria: social security agreement approved by Austrian National Council
- ▶ Ecuador and Korea (Rep.): sixth round of negotiations for a strategic economic cooperation agreement held
- ▶ Ecuador and United States: exchange of information agreement approved by Ecuador's National Assembly
- ▶ MERCOSUR and Singapore: sixth round of negotiations for free trade agreement held
- ▶ Mexico and Germany: amending protocol to income and capital tax treaty approved by Germany's lower house of parliament
- ▶ Mexico and United Kingdom: first round of negotiations for free trade agreement held
- ▶ United States and Kenya: negotiations for a strategic trade and investment partnership launched

Upcoming webcasts

[Taxing crypto and other digital assets: using practical scenarios to explore key tax concepts for individuals and businesses \(21 July\)](#)

In this webcast, panelists discuss recent digital assets tax trends and the outlook for changes relevant to individuals and financial services companies.

[Financing the energy transition: How US tax equity arrangements work \(28 July\)](#)

In this webcast, panelists will explore tax equity arrangements, current trends in the tax equity market and the role of tax equity in energy transition.

For a full list of upcoming webcasts, please access EY's webcast page on ey.com [here](#).

Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 15 July 2022](#)

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

Highlights this week include:

- ▶ US Congress returns to Washington following 4 July recess; Sen. Manchin will not support climate measures, tax increases in budget reconciliation following US inflation report
- ▶ IRS releases proposed FX regulations
- ▶ US plans to terminate US-Hungary tax treaty
- ▶ OECD releases Progress Report on Amount A of Pillar One

You can register for this weekly podcast on iTunes [here](#).



This week's EY Global Tax Alerts

Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments – 15 July 2022](#)
- ▶ [Uruguay's Administrative Contentious Court strikes down portion of decree regulating free trade zones](#)
- ▶ [Uruguay's Executive Power presents accountability bill for 2021 to Parliament](#)
- ▶ [Costa Rica's Government publishes regulations to implement the Digital Nomads Law](#)
- ▶ [US proposed regulations would limit Section 1256 mark-to-market accounting for foreign currency contracts to foreign currency forward contracts](#)
- ▶ [PE Watch: Latest developments and trends, July 2022](#)

OECD Alerts

- ▶ [OECD releases Progress Report on Amount A of Pillar One of BEPS 2.0 project and invites public comment](#)
- ▶ [OECD releases Progress Report on Amount A of Pillar One of BEPS 2.0 project: A detailed overview](#)

Human Capital Alerts

- ▶ [China reduces COVID-19 isolation period for all inbound travelers, PU letters no longer required for business visitors](#)
- ▶ [Sri Lanka introduces new 10-year Golden Paradise Residence Visa for investors](#)

Indirect Tax Alerts

- ▶ [Italy's plastic tax will enter into force on 1 January 2023](#)
- ▶ [Portugal publishes guidance on contribution for single-use packaging made of plastic or multi-material with plastic in Portugal](#)

Transfer Pricing Alerts

- ▶ [Israel adopts BEPS Action 13 principles](#)
- ▶ [The Netherlands issues new transfer pricing decree](#)

Other Global Tax Alerts

- ▶ [Denmark publishes draft bill introducing tax liability for activities carried out in Denmark's Exclusive Economic Zone](#)
- ▶ [Poland proposes significant changes to Corporate Income Tax law](#)
- ▶ [South Africa | Overview of procedure to cease tax residency](#)
- ▶ [Italian Tax Authority issues Ministerial Circular on Mandatory Disclosure Rules](#)
- ▶ [Saudi Arabia issues public consultation document to modify Transfer Pricing Bylaws](#)
- ▶ [South African Revenue Service implements new protocol for estimated assessments](#)
- ▶ [Tanzania's President assents to Finance Act 2022](#)
- ▶ [Italian Court of Cassation holds domestic regime is applicable on distributions to nonresident mutual funds](#)



EY Industry and Tax Services publications

Industries

Consumer Products & Retail

- ▶ [How to generate retail growth through alternative revenue streams](#)
- ▶ [Future Consumer Index: In crisis, but in control](#)

Health & Life Sciences

- ▶ [How can greater localization increase supply chain resilience?](#)
- ▶ [How CDMO companies are leading innovation for pharmaceutical partners](#)

Services

People and workforce

- ▶ [Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker](#)

Comments

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

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