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14 November 2022

# Americas Tax Roundup

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## Latest news – Americas

### [Inflation Reduction Act does not trigger 15% income tax rate on industrial development income in Puerto Rico](#)

In Informative Bulletin 22-11, the Puerto Rico Treasury Department has clarified that the 15% alternative minimum tax (CAMT) on the "adjusted financial statement income" of certain corporations enacted as part of the Inflation Reduction Act (IRA), P.L. 117-69, has not triggered the 15% income tax rate on industrial development income (IDI) in Puerto Rico. Act 52-22, recently enacted in Puerto Rico, imposes a 15% rate on a taxpayer's IDI, instead of the 10.5%, if the United States amends the US Internal Revenue Code to apply a corporate income tax rate of at least 15% to a controlled foreign corporation's income. Informative Bulletin 22-11 makes it clear that the applicable rate remains 10.5%.

### [Argentine Commission on Foreign Affairs approves bill to ratify MLI](#)

On 8 November 2022, Argentina's Chamber of Deputies' permanent advisory Commission of Foreign Affairs approved the bill to ratify the Multilateral Instrument to implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting. This approval leads the way for the vote of the Chamber of Deputies and National Senate, needed for formal ratification and subsequent deposit of the instrument with the OECD.

### [El Salvador | Tax Code reforms to implement electronic invoicing are approved](#)

On 30 August 2022, the Salvadoran Legislative Assembly approved a Legislative Decree amending the Tax Code. The decree enables electronic invoicing in El Salvador and the issuance of electronic tax documents.

### [Paraguay publishes new immigration law](#)

The Paraguayan Government published a new immigration law on 18 October 2022 that introduces changes to the rules governing foreign nationals who seek to enter or establish residence in the country. The Government is set to publish regulations within 180 days of the law's publication, which will provide additional details regarding the changes under the law.

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

The latest edition of EY's PE Watch is available, among other things providing an update on Colombia's proposal on significant economic presence.

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

- ▶ Argentina and United States: signing of FATCA authorized by Argentina
- ▶ Brazil and Norway: income tax treaty signed
- ▶ Chile and Croatia: negotiations for social security agreement authorized by Croatia
- ▶ Chile and Romania: social security agreement approved by Romanian Chamber of Deputies
- ▶ Paraguay and Spain: tax treaty initialed



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## Upcoming webcasts

### [Financial reporting for private companies - what you need to know for 2022 \(16 November\)](#)

In this webcast, EY will cover important financial reporting considerations for private companies in preparation for 2022 year-end reporting.

### [BorderCrossings . . . US-Japan transfer pricing considerations \(17 November\)](#)

During this webcast, part of an ongoing monthly series, EY transfer pricing and tax professionals will help you stay informed and able to adopt a more proactive stance in developing and defending your transfer pricing policies and practices.

### [Tax in the time of COVID-19: Update on legislative, economic, regulatory and IRS development \(18 November\)](#)

COVID-19 and the resulting economic crisis have made reacting to tax developments more complicated than ever. Join us for the next webcast in our series as we discuss how businesses can navigate the tax policy environment and continue to effectively operate their tax function in this time of crisis and change. Panelists will provide updates on: (i) the US economy and tax policy; (ii) breaking developments; and (iii) what's happening at the IRS.

### [How a changing M&A and geopolitical landscape will impact tax strategies \(29 November\)](#)

Based on the current market environment, it is key that businesses consider their M&A strategy. In this webcast, panelists will discuss updates on the global M&A market.

### [Global treasury: Key tax trends and topics to consider for 2023 \(8 December\)](#)

A global EY panel will discuss key tax trends and topics that will affect global treasury activity in 2023. This session will cover, in particular, multinationals' cash management and risk management activities, as well as the potential effect of Pillar Two and the trends in financial transaction transfer pricing controversy.

### [Omnishoring: Recent trends in supply chain, tax and global trade \(13 December\)](#)

A global EY panel will discuss the current factors that affect supply chain. This session will cover the macroeconomic, geopolitical and operational trends driving multinationals to reconsider the resilience of their supply chain across the manufacturing, logistics, distribution and sales functions.

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

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## Recently archived webcasts

### [International tax talk quarterly series with the EY Global Tax Desk Network: A discussion on recent tax developments in the LATAM region](#)

Latin America has a complex tax environment, and recent developments in the region have resulted in additional considerations for year-end and future years. Panelists addressed the expected impact of regional developments.



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## Recently issued EY podcasts

### [US Cross-Border Taxation weekly podcast, 11 November 2022](#)

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

- ▶ US congressional lame duck tax legislation unclear amid midterm election uncertainty
- ▶ Proposed foreign tax credit regulations coming soon, limited CAMT guidance this year
- ▶ IRS releases 2022-2023 Priority Guidance Plan
- ▶ Congressional ranking Republicans urge reversal of decision to terminate US-Hungary tax treaty
- ▶ Biden Administration nominates new IRS Commissioner

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

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## This week's EY Global Tax Alerts

### Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments – 11 November 2022](#)
- ▶ [PE Watch: Latest developments and trends, November 2022](#)
- ▶ [Argentine Commission on Foreign Affairs approves bill to ratify MLI](#)
- ▶ [Canada | Federal Fall Economic Statement 2022](#)
- ▶ [Inflation Reduction Act does not trigger 15% income tax rate on industrial development income in Puerto Rico](#)

### Human Capital Alerts

- ▶ [Australia | Reshaping skilled migration and resetting processing priorities](#)
- ▶ [Italian Tax Authority publishes guidance on taxation of trusts in Italy](#)
- ▶ [New Zealand's minimum wage threshold to increase while reform remains a work in progress](#)
- ▶ [Paraguay publishes new immigration law](#)
- ▶ [UK implements changes to multiple visitor and worker categories](#)
- ▶ [UK implements new policy regarding the reporting of foreign workers' employment start dates](#)
- ▶ [US Department of Homeland Security implements Deferred Action for Childhood Arrivals Final Rule](#)

### Indirect Tax Alerts

- ▶ [El Salvador | Tax Code reforms to implement electronic invoicing are approved](#)
- ▶ [German Government releases draft legislation for a Single-Use Plastics levy in Germany](#)



## Other Global Tax Alerts

- ▶ [EU Finance Ministers agree on Code of Conduct mandate reform](#)
- ▶ [High Court of Kenya will not address grounds for objection not originally presented at the appellate level](#)
- ▶ [Türkiye enacts new law amending various tax laws](#)
- ▶ [UAE issues new Tax Procedures Decree Law](#)

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## EY Industry and Tax Services publications

### Industry

#### Consumer Products & Retail

- ▶ [How regulated products will be the next wave of e-commerce](#)
- ▶ [Prioritize commerce transformation to drive long-term gains](#)
- ▶ [Realizing Carrier Residential's e-commerce ambitions](#)

### Energy

- ▶ [An energy company's transformation for the 21st-century customer](#)

### Insurance

- ▶ [How insurers can build the finance function of the future](#)

### Private Equity

- ▶ [Private Equity Pulse: Five takeaways from 3Q 2022](#)

### Technology, Media & Entertainment, and Telecommunications

- ▶ [Podcast: Are you ready for the next generation of the gaming industry?](#)

### Services

#### People and workforce

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

## Comments

EY's *Americas Tax Roundup* is produced and distributed by Ernst & Young LLP's Tax Technical Knowledge Services Group.

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).



EY | Building a better working world

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