

Americas Tax Roundup

Latest news – Americas

[Brazilian Government publishes Provisional Measure adopting arm's-length principle](#)

After several years of joint work between the Brazilian Federal Revenue Service and the OECD, the Brazilian Government on 29 December 2022 published Provisional Measure No. 1,152, which introduces new transfer pricing (TP) rules in Brazil. The PM is a Presidential Decree that has the force of law, but must be approved by the Brazilian Congress within 120 calendar days of its next session beginning in February 2023. Under the PM, Brazil will adopt the arm's length standard for all cross-border intercompany transactions and other fundamental TP principles.

[Argentina implements new mandatory disclosure regime for international transactions](#)

On 27 December 2022, the Argentine tax authority published General Resolution No. 5306/2022, which establishes a new informative regime for certain international transactions that Argentine legal entities must comply with and replaces the suspended mandatory reporting regime for domestic and international arrangements enacted by General Resolution No. 4838/2020. Entities categorized as micro, small or medium-sized companies on the tax authority's website are not required to comply with the new regime.

[Peru extends temporary capital gains tax exemption for securities transferred through Lima Stock Exchange subject to certain restrictions](#)

On 30 December 2022, Peru's President enacted Law 31662, amending the temporary tax exemption for capital gains derived from the transfer of securities through the Lima Stock Exchange (LSE). Under the law, the temporary tax exemption has been extended to 31 December 2023.

[Costa Rica's tax authority publishes income tax brackets for tax year 2023](#)

Costa Rica's tax authority published the income tax brackets applicable for tax year 2023. The new brackets are for corporate income, income from profitable activities and the salary tax. The brackets went into effect on 1 January 2023.

[Uruguay's Ministry of Economy and Finance sets minimum non-taxable amount of net wealth tax](#)

On 27 December 2022, Uruguay's Ministry of Economy and Finance issued Decree No.421/022, adjusting the net wealth tax minimum non-taxable amount applicable to individuals for tax year 2022. According to the decree, the non-taxable amount for individual taxpayers and undivided successions is set at UYU5,831,000 (equivalent to approximately US\$145,800).

[Uruguay updates list of countries or jurisdictions deemed low or no taxation](#)

On 28 December 2022, the Uruguayan Tax Administration issued Resolution No. 2,470/022, which updates the list of countries or jurisdictions that are considered to be low or no taxation.

[Uruguay Government proposes tax incentives to attract IT professionals](#)

Uruguay's Executive Power has submitted a bill to Parliament that would allow IT professionals who migrate to Uruguay to elect to be subject to nonresidents income tax at a flat rate of 12%, instead of personal income tax at progressive rates that range from 0% to 36%.



[Uruguay introduces zero VAT rate on hotel-related services to resident tourists for the summer season](#)

Uruguay enacted Law N°20,098, establishing that lodging-related services rendered to resident tourists will be subject to a 0% value-added tax (VAT) rate (treatment that already applies for nonresidents) until 28 February 2023.

[US announces suspension of routine visa services and imposition of COVID-19 testing requirement affecting travel from People's Republic of China](#)

US Mission China Consular Services announced on 15 December 2022, that the US Embassy in Beijing and US Consulate General in Shanghai are providing passport and emergency citizen services only.

This week's tax treaty news in the Americas

- ▶ Argentina and the United States: FATCA agreement entered into force
- ▶ Argentina and Uruguay: memorandum of understanding on the exchange of financial information signed
- ▶ Australia; Brunei; Canada; Chile; Japan; Malaysia; Mexico; New Zealand; Peru; Singapore; Vietnam: Comprehensive and Progressive Agreement for Trans-Pacific Partnership entered into force in respect of Chile
- ▶ Brazil and Norway: income tax treaty approved by Norwegian parliament
- ▶ Canada and India: intention to negotiate and sign a free trade agreement expressed by India
- ▶ Chile and India: income tax treaty entered into force
- ▶ Ecuador and China: free trade agreement initialed
- ▶ United States and Germany: Joint Statement on the Implementation of the Spontaneous Exchange of Country-by-Country Reports signed

Upcoming webcasts

[BEPS 2.0: New OECD releases and ongoing implementation activity \(12 January\)](#)

Webcast panelists will examine the latest OECD releases on both BEPS 2.0 Pillars and explore the growing legislative activity as jurisdictions begin to incorporate global minimum tax rules into their domestic law. Please join EY professionals for this webcast.

[Tax in a time of transition: US Legislative, economic, regulatory and IRS developments \(20 January\)](#)

Companies need to keep pace with a tax and economic environment in transition. This requires understanding tax policy trends and anticipating future developments that could impact their operations. Join us for a fast-paced overview of recent US tax and economic developments designed to help stay on top of changes in today's shifting economic, legislative and regulatory environment. In this regularly occurring webcast series, panelists will provide updates on: (i) the US economy and tax policy; (ii) what's happening at the IRS; and (iii) breaking developments.

[International tax talk quarterly series: With the EY Global Tax Desk Network \(24 January\)](#)

This webcast highlights developments that could affect multinational companies operating in Hong Kong and mainland China. Concerns expressed by the European Union have prompted legislative changes to Hong Kong's FSIE regime, effective beginning 1 January 2023. These changes will have wide-ranging implications for many Hong Kong holding and finance companies (with exceptions for certain financial businesses), as well as companies holding intellectual property.



[How life sciences tax departments are preparing for sustainability \(24 January\)](#)

Please join us for this webcast where we will explore sustainability tax trends and global developments in the life sciences sector. EY teams of life sciences and sustainability tax thought leaders will discuss, and share their perspectives on emerging trends and hot topics relevant to this market.

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

Recently archived webcasts

[Tax in the time of COVID-19: US update on legislative, economic, regulatory and IRS developments](#)

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

Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 6 January 2023](#)

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

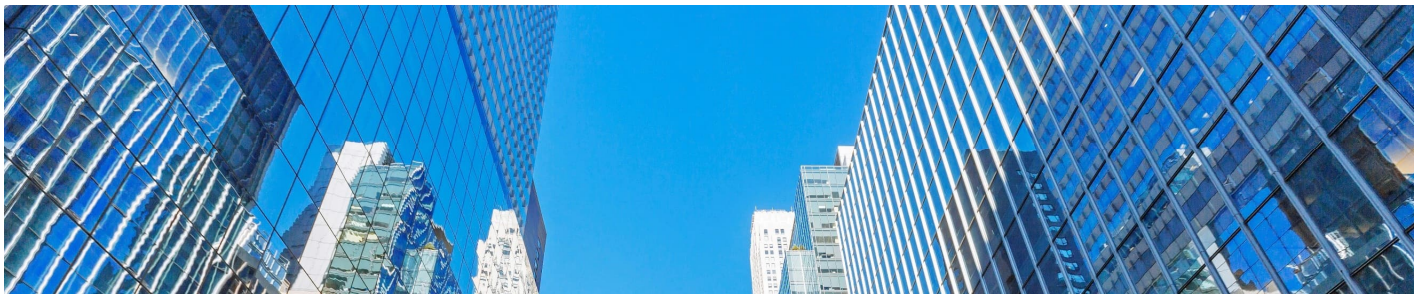
- ▶ IRS issues interim guidance on application of new corporate alternative minimum tax
- ▶ IRS releases interim guidance on excise tax on certain corporate stock buybacks
- ▶ IRS releases final regulations on FIRPTA tax exception for qualified foreign pension funds and qualified controlled entities

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

This week's EY Global Tax Alerts

Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments – 6 January 2023](#)
- ▶ [Argentina implements new mandatory disclosure regime for international transactions](#)
- ▶ [Brazilian Government publishes Provisional Measure adopting arm's-length principle](#)
- ▶ [Costa Rica's Tax Authority publishes income tax brackets for tax year 2023](#)
- ▶ [Peru extends temporary capital gain tax exemption for securities transferred through Lima Stock Exchange subject to certain restrictions](#)
- ▶ [Uruguay Government proposes tax incentives to attract IT professionals](#)
- ▶ [Uruguay updates list of countries or jurisdictions deemed low or no taxation](#)
- ▶ [Uruguay's Ministry of Economy and Finance sets minimum non-taxable amount of Net Wealth Tax](#)



Human Capital Alerts

- ▶ [Pre-arrival molecular COVID-19 test required to enter Canada for those traveling from China, Hong Kong or Macao](#)
- ▶ [China Mainland further relaxes COVID-19-related travel restrictions](#)
- ▶ [China Mainland to lift additional COVID-19-related restrictions on 8 January 2023](#)
- ▶ [Hong Kong implements new immigration policies to attract overseas and mainland Chinese talent](#)
- ▶ [Ireland implements new requirements for certain applicants under Atypical Working Scheme](#)
- ▶ [Malaysia announces new COVID-19-related entry requirements for inbound travelers](#)
- ▶ [Morocco temporarily prohibits entry of travelers from China Mainland](#)
- ▶ [Portugal extends expired permits and visas automatically to 31 December 2023](#)
- ▶ [Spain implements new COVID-19 testing requirements for travelers arriving from China Mainland](#)
- ▶ [United Kingdom implements new COVID-19 testing requirements for travelers arriving from China Mainland](#)
- ▶ [US announces suspension of routine visa services and imposition of COVID-19 testing requirement affecting travel from People's Republic of China](#)

Indirect Tax Alerts

- ▶ [Europe | A review of three key environmental tax changes to take place in 2023](#)
- ▶ [Saudi Arabia announces second wave of Phase 2 e-invoicing integration](#)
- ▶ [Turkey implements Accommodation Tax](#)
- ▶ [Uruguay introduces zero VAT rate on hotel-related services to resident tourists for the summer season](#)

Other Global Tax Alerts

- ▶ [Saudi Arabia Ministry of Finance issues Zakat Collection Rules for Investment Funds](#)
- ▶ [Spain implements temporary bank levy](#)

EY Industry and Tax Services publications

Industry

Health and Life Sciences

- ▶ [How life sciences companies can secure value through better dealmaking](#)

Private Equity

- ▶ [Three cash disciplines to create value and resilience](#)

Services

People and workforce

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



Comments

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