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3 April 2023

Americas Tax Roundup

Latest news – Americas

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[Canada's federal budget 2023/24 discussed](#)

On 28 March, Federal Finance Minister Chrystia Freeland tabled the 2023/24 budget. This budget focuses on several priorities, including providing targeted inflation relief for Canadians most in need and other affordability measures to support students, seniors, small businesses and the middle class; building more affordable housing; investing in public health care, including implementing the new Canadian Dental Care Plan; and making significant investments to support Canada's transition to a clean economy while also

supporting the creation of good jobs for Canadians.

[Canada: New Brunswick issues budget 2023/24](#)

On 21 March 2023, New Brunswick Minister of Finance and Treasury Board Ernie Steeves tabled the province's fiscal 2023/24 budget. The budget contains no new taxes and no tax increases.

[Canada: Saskatchewan issues budget 2023/24](#)

On 22 March 2023, Saskatchewan Finance Minister Donna Harpauer tabled the province's fiscal 2023/24 budget. The budget contains tax measures affecting individuals and corporations. The Minister anticipates a surplus of CA\$1.018 billion for 2023/24 and projects small surpluses for each of the next three years.

[Peruvian Government modifies minimum interest rate allowed for national and foreign currency loans](#)

A new Peruvian legislative decree modifies the minimum interest rate allowed for loans in local and foreign currency, given that LIBOR rates will no longer be published. The decree will be effective as of 1 January 2024.

[Costa Rican Executive Branch publishes regulations on law to promote investment competitiveness outside the greater metropolitan area](#)

The Costa Rican Executive Branch recently published six new Executive Decrees intended to regulate provisions of a law aimed at promoting investment competitiveness outside of the greater metropolitan area. The new regulations will be of interest to companies that are looking to make new investments and want to apply for the benefits of the free trade zone regime outside of the greater metropolitan area.

[Costa Rican inactive entities must file their informative return on new form D-195 by 31 May 2023](#)

The Costa Rican tax authority has extended the due date for inactive entities (i.e., those with no economic activity) to file Form D-195 to 31 May from 30 April.

[Panama implements major changes in work permit regulations as of 1 April 2023](#)

On 1 April 2023, Panama's immigration framework will undergo major changes, including a restructuring of work permit categories, updated application processing times and new conditions for filing extension applications.



[US IRS official says enhanced IRS pre-filing process will provide taxpayers with a more robust view of APA suitability](#)

The Acting Deputy Commissioner of the US Internal Revenue Service's Large Business and International Division said that the IRS plans to implement a new process for taxpayers considering applying for an Advance Pricing Agreement (APA). Under this new process, the IRS and taxpayer will engage early on so the IRS can provide feedback to the taxpayer on whether the proposed transactions to be covered in an APA would be best resolved in the APA program or some other process, such as the International Compliance Assurance Programme.

[United States | March 2023 COVID-related immigration updates](#)

On 23 March 2023, US Citizenship and Immigration Services (USCIS) announced the end of the COVID-19 flexibilities for responding to requests, notices, and decisions issued in connection with certain immigration benefits and programs.

[USCIS announces completion of H-1B initial electronic registration selection process](#)

On 27 March 2023, US Citizenship and Immigration Services (USCIS) announced that it has received enough electronic registrations to reach the FY 2024 H-1B numerical allocations. Prospective petitioners with selected registrations may file FY 2024 H-1B cap-subject petitions, including those petitions eligible for the advanced degree exemption, with USCIS beginning 1 April 2023.

[Brazil reinstates visa requirements for Australia, Canada, Japan and US nationals](#)

Effective 1 October, nationals of Australia, Canada, Japan and the US will be required to obtain a visa prior to entering Brazil for business, tourism and other purposes. Additional details including application requirements, processing times and visa validity periods are expected to be released by the Brazilian Ministry of Foreign Affairs in the near future.

[OECD holds public consultation meeting on compliance and tax certainty aspects of Pillar Two global minimum tax](#)

On 16 March 2023, the OECD held a virtual consultation meeting on the public consultation documents that had been released by the OECD Secretariat on 20 December 2022 on the Pillar Two GloBE information return and on tax certainty for the Pillar Two GloBE rules in connection with the ongoing OECD/G20 project on *Addressing the Tax Challenges Arising from the Digitalisation of the Economy* (the so-called BEPS 2.0 project). During the consultation meeting, three panels of business representatives and an academic discussed tax certainty and two panels of business representatives discussed the GloBE information return.

[The Latest on BEPS and Beyond: 2022 and beyond in review](#)

This special edition of EY's monthly *Latest on BEPS and Beyond* report provides an overview of the most important international tax developments through 2022 and the beginning of 2023. It also highlights global and regional policy trends. This edition also covers the progress of the G20/OECD Inclusive Framework on BEPS in its negotiations on Pillar One and Two of BEPS 2.0.

[Now available! EY's Worldwide VAT, GST and Sales Tax Guide 2023](#)

Outlining value-added tax (VAT) systems in 149 jurisdictions, the 2023 edition of EY's annual reference book, [Worldwide VAT, GST and Sales Tax Guide](#), is now available in PDF format on ey.com. All of the content is current as of 1 January 2023. New chapters for 2023 include: Antigua and Barbuda, Bosnia and Herzegovina, Fiji, Guyana, Republic of Montenegro, Mozambique, Nepal and Senegal.



This week's tax treaty news in the Americas

- ▶ Brazil and Poland: income tax treaty approved by Polish Senate
- ▶ Canada and Austria: administrative arrangement to social security agreement entered into force
- ▶ Paraguay and Spain: income tax treaty signed
- ▶ United States and Romania: social security agreement and administrative arrangement signed
- ▶ Uruguay and Andorra: interest in negotiating an income and capital tax treaty expressed by Andorra

Upcoming webcasts

[What to know about the 2023 EY Tax risk and controversy survey results – Americas and Europe \(5 April\)](#)

In this webcast for Americas and European audiences, EY explores how taxpayers perceive and manage tax risk and controversy in 2023.

[EY global economic webcast outlook \(19 April\)](#)

This webcast will examine the economic outlook for 2023–24 and how companies can adapt and thrive despite elevated economic uncertainty, financial market volatility and persistent inflation.

[Tax in a time of transition: Legislative, economic, regulatory and IRS developments \(21 April\)](#)

Please join us for a fast-paced overview of recent tax and economic developments designed to help you 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.

[US corporate income tax compliance \(26 April\)](#)

The corporate tax landscape continues to evolve as we prepare for the tax year 2022 filing season. Join EY professionals for an in-depth discussion of how companies can continue to navigate the complexity and challenges of the ever-changing tax compliance landscape, while preparing for tax year 2022 and beyond.

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, 31 March 2023](#)

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

- ▶ OECD official expects agreement on Amount B of BEPS Pillar One by middle of 2023
- ▶ IRS releases 24th annual APA report
- ▶ House Republican tax writers seek to defund US' OECD contribution

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 – 31 March 2023](#)
- ▶ [OECD holds public consultation meeting on compliance and tax certainty aspects of Pillar Two global minimum tax](#)
- ▶ [The Latest on BEPS and Beyond | 2022 in review](#)
- ▶ [Canada: New Brunswick issues budget 2023/24](#)
- ▶ [Canada: Saskatchewan issues budget 2023/24](#)
- ▶ [Costa Rican inactive entities must file their informative return on new form D-195 by 31 May 2023](#)
- ▶ [Costa Rican Executive Branch publishes regulations on law to promote investment competitiveness outside the Greater Metropolitan Area](#)
- ▶ [Peruvian Government modifies minimum interest rate allowed for national and foreign currency loans](#)
- ▶ [US IRS issues annual APA report for 2022 showing significant increase in number of APAs filed](#)
- ▶ [US IRS considers Section 482 regulation for implicit support in pricing intercompany loans](#)

Other Global Tax Alerts

- ▶ [Australia proposes to impose additional registration requirements under the Foreign Investment Review Board Regulations](#)
- ▶ [Japan enacts 2023 tax reform bill including legislation to implement IIR to align with OECD BEPS 2.0 Pillar Two](#)
- ▶ [Kenya Tax Appeals Tribunal reiterates that private ruling is binding on Tax Authority](#)
- ▶ [Poland defers deadline for Corporate Income Tax and Shifted Profits Tax](#)
- ▶ [UK publishes legislation for multinational top-up tax and domestic top-up tax](#)

Human Capital Alerts

- ▶ [Brazil reinstates visa requirement for nationals of Australia, Canada, Japan and the US](#)
- ▶ [Canada announces new federal permanent residence program](#)
- ▶ [Canada extends Canada-Ukraine Authorization for Emergency Travel program](#)
- ▶ [Czech Republic extends visa ban for Russian and Belarusian nationals until 31 March 2024](#)
- ▶ [Panama implements major changes in work permit regulations as of 1 April 2023](#)
- ▶ [Portugal begins accepting online Residence Permit applications from nationals of Portuguese-Speaking Countries](#)
- ▶ [Portugal's restructuring of Immigration and Border Services leads to staff strike from 5 April 2023](#)
- ▶ [UK concession for offshore wind workers to end on 30 April 2023](#)
- ▶ [United States | March 2023 COVID-related updates](#)



Indirect Tax Alerts

- ▶ [Bulgaria introduces measures for addressing high energy prices](#)
- ▶ [Saudi Arabia amends Implementing Regulations on excise tax](#)
- ▶ [UK Government launches consultation on a carbon border adjustment mechanism and other measures](#)

EY Industry and Tax Services publications

Industry

Health and Life Sciences / Technology / Private Equity / Energy

- ▶ [How ready are you to go public when the opportunity arises?](#)

Services

People and workforce

- ▶ [Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker](#)
- ▶ [Video: The Board Imperative: Is your people strategy human enough?](#)

Comments

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