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working world

30 October 2023

# Americas Tax Roundup

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## Latest news – Americas

Tax information at your fingertips

[Global Tax Guides app](#)

Access tax technical data on 150+ jurisdictions from your iPad® anywhere in the world.

[Download the guides here.](#)

[OECD releases Multilateral Convention to implement Pillar One Amount A – EY provides in-depth analysis](#)

On 11 October 2023, the OECD/G20 Inclusive Framework on BEPS released a [text](#) of the Amount A Multilateral Convention (MLC). The objective of the MLC is to create a coordinated agreement to reallocate taxing rights to market jurisdictions with respect to a portion of the profits of in-scope multinational enterprises (MNEs) in excess of 10% of their global revenues.

[Chilean Congress asked to approve double tax treaty with United States](#)

On 25 October 2023, Chile's Government submitted to the Chilean Congress for approval the US-Chile income tax treaty. The text to be approved by the Chilean Congress includes reservations made by the US Senate on Article 23 (Relief from Double Taxation).

[UPDATED! EY's Green Tax Tracker \(October 2023\) | Keeping pace with sustainability incentives, carbon regimes and environmental taxes in 65 jurisdictions](#)

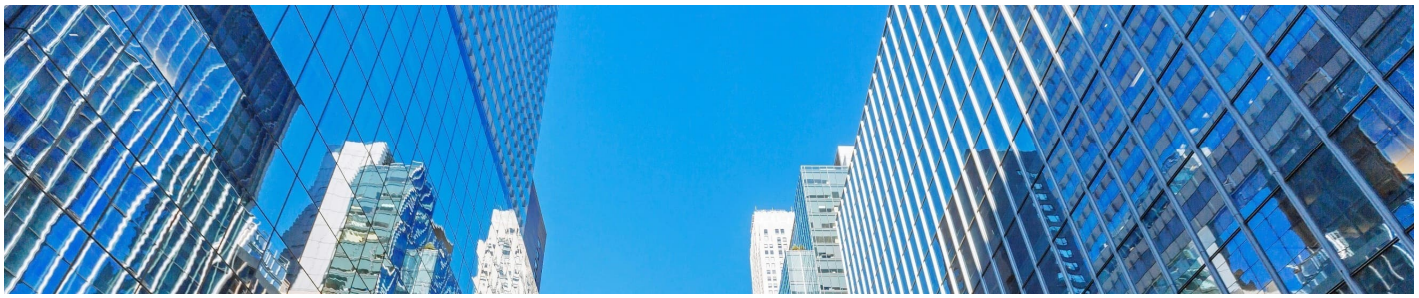
Governments around the world are using sustainability tax measures to reduce emissions, meet their commitments on carbon neutrality and tackle climate change, as well as to raise revenue and fund important policy objectives. While these goals are shared, the policies established to achieve them vary greatly. In the [Green Tax Tracker](#), EY Teams offer a snapshot of sustainability incentives, carbon regimes, environmental taxes and environmental tax exemptions present in 65 jurisdictions.

[Canada launches pilot program to streamline work permit processing for Canadian employers recruiting in the Philippines](#)

On 19 October 2023, the Minister of Immigration, Refugees and Citizenship announced the launch of the CAN Work Philippines program – a pilot program aimed at streamlining the work permit processing for eligible Canadian employers recruiting in the Philippines. This pilot program will implement new procedures, technologies, and policies intended to accelerate work permit processing, allowing employers to schedule group appointments for medical examinations and biometrics for potential employees.

[Canadian High Commission provides update on visa processing delays in India](#)

On 19 October 2023, Canada's Minister of Immigration provided an update on the situation between Canada and India, specifically as it relates to immigration processing. Amid the ongoing diplomatic dispute, the Canadian government has announced a reduction in staff at the Canadian visa office in New Delhi, which will negatively impact processing times for visas. While continued processing of applications is reassuring, clients throughout the Canadian immigration process may experience delays throughout the various stages of the immigration process.



### [India resumes processing Business and Conference Visa applications from Canadian nationals](#)

The Indian High Commission in Ottawa, Canada, announced that effective 26 October 2023, it has resumed processing applications from eligible Canadian nationals for Business and Conference Visas, among others. In a press release dated 25 October 2023, the Indian High Commission in Ottawa confirmed it is also accepting applications from eligible Canadian nationals for Entry Visas and Medical Visas. The Indian Ministry of External Affairs had suspended the issuance of all visas to Canadian nationals effective 21 September 2023. Issuance of Employment and Tourist Visas to Canadian nationals remains suspended.

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

- ▶ Brazil and India: social security agreement will enter into force
- ▶ Brazil and Mozambique: social security agreement ratified
- ▶ Brazil and San Marino: exchange of information agreement enters into force
- ▶ Chile and United States: exchange of letters to tax treaty signed
- ▶ Curaçao and Suriname: interest expressed in concluding tax treaty
- ▶ Quebec and Belgium: Belgium approves amendment to social security agreement with Quebec
- ▶ United States and Taiwan: US Congressional Leaders formally introduce US-Taiwan double-tax relief bill
- ▶ United States and Uruguay: signed an exchange of information agreement relating to tax matters

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## Upcoming webcasts

### [Crypto and digital asset information reporting: Navigating the operational challenges of the recently proposed regulations \(1 November\)](#)

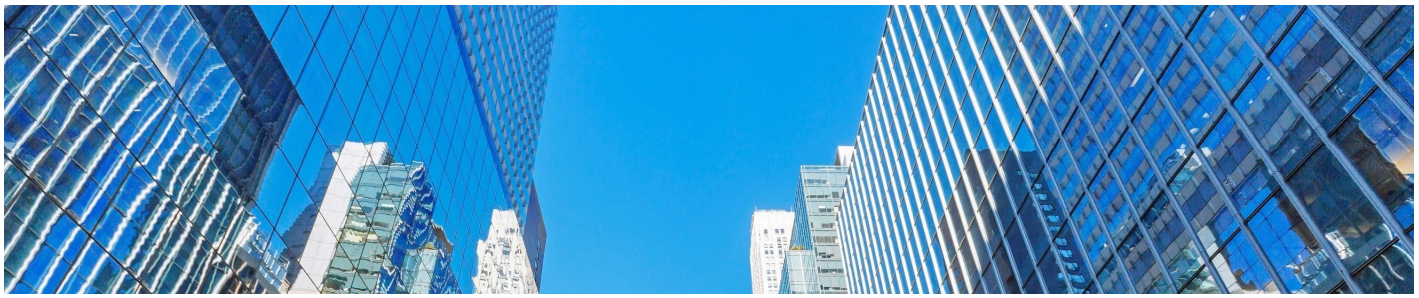
The proposed regulations issued by the US IRS and Treasury Department introduce new standards unlike any seen previously in the digital asset space. Join EY for a webcast discussion on operational challenges, implementation considerations, and maintaining a seamless client experience in the dynamic digital asset sector.

### [Realizing the full potential of your tax and finance function \(7 November\)](#)

With over 60 years of cumulative experience helping many of the world's largest financial services institutions transform their tax functions, a panel of industry changemakers will highlight leading practices and discuss the challenges many firms face. The panel will discuss how financial services institutions are elevating their tax operating models to: (i) empower their people to shape change; (ii) utilize technology to improve efficiency and data integrity; and (iii) future-proof their tax and finance responsibilities.

### [Tax considerations for asset managers and their families \(9 November\)](#)

Asset managers and high-income earners have been making tax headlines in the past year with recent tax court filings, IRS enforcement efforts and more. Join our panel of Financial Services Private Tax professionals as they share insights on key tax developments and what they might mean for asset managers and their family offices.



### [International tax talk quarterly series with the EY Global Tax Desk Network \(14 November\)](#)

During this webcast, part of an ongoing series, a panel of experienced EY professionals will provide information on major tax law changes in the countries and jurisdictions across the globe.

### [How workforce mobility can navigate AI and global legislative changes \(15 November\)](#)

During this first of a two-part CPE-eligible webcast series, EY professionals will provide global highlights on key legislative changes and considerations for global mobility programs, across immigration, tax, social security and work anywhere.

### [Tax in a time of transition: US legislative, economic, regulatory and IRS developments \(17 November\)](#)

Companies need to keep pace with a tax and economic environment in transition. Please join us for a fast-paced overview of recent US tax and economic developments designed for professionals to 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.

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## Recently archived webcasts

### [EY Tax.Tech™ Ecosystem series](#)

Finance and Tax alignment is critical and can unlock data to help identify synergies and establish viable and enduring business value. The webcast will explore how Thomson Reuters tax and accounting clients have adopted a transformation mindset through better aligning with the finance agenda, integrating into an enterprise resource planning (ERP) strategy, and helping their people, processes and technology improve their tax function and better utilize their ONESOURCE suite of products.

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## Recently issued EY podcasts

### [EY Podcast: weekly US international cross-border taxation news for week ending 27 October 2023](#)

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

- ▶ US House of Representatives chooses new speaker
- ▶ US-Chile tax treaty's reservations incorporated in US Model Treaty
- ▶ US, Uruguay sign TIEA
- ▶ IRS sending compliance alerts to 150 US-based subsidiaries of foreign-owned corporations
- ▶ IRS says PTEP proposed regs now expected in early 2024
- ▶ Cyprus announces Cyprus-US CAA for exchange of CbC reports will be effective for RFYs starting on/after 1 January 2023
- ▶ OECD BEPS IF considering Pillar 2 guidance on treatment of deferred tax assets in countries with federal and subnational taxes

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





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## This week's EY Global Tax Alerts

### Americas Tax Alerts

- ▶ [Report on recent US international tax developments – 27 October 2023](#)
- ▶ [OECD releases Multilateral Convention to implement Pillar One Amount A – EY provides in-depth analysis](#)
- ▶ [Chilean Congress asked to approve double tax treaty with United States](#)
- ▶ [Canada launches pilot program to streamline work permit processing for Canadian employers recruiting in the Philippines](#)
- ▶ [Canadian High Commission provides update on visa processing delays in India](#)

### Other Global Tax Alerts

- ▶ [Ethiopia issues a Directive to regulate the opening and operations of offshore foreign-exchange accounts](#)
- ▶ [EU adopts Directive introducing tax transparency rules for crypto assets \(DAC8\)](#)
- ▶ [India's Supreme Court rules 'notification' mandatory to invoke Most Favored Nations clause in India's tax treaties](#)
- ▶ [Germany to lower reporting thresholds for energy and electricity tax subsidies](#)

### Human Capital Alerts

- ▶ [Italy publishes work permit quotas for 2023 until 2025](#)
- ▶ [UK announces increase in Immigration Health Surcharge expected to go into effect on 16 January 2024](#)
- ▶ [Canada launches pilot program to streamline work permit processing for Canadian employers recruiting in the Philippines](#)
- ▶ [Canadian High Commission provides update on visa processing delays in India](#)
- ▶ [India resumes processing Business and Conference Visa applications from Canadian nationals](#)
- ▶ [Hong Kong Chief Executive announces several upcoming immigration changes](#)

### Indirect Tax Alerts

- ▶ [France submits new e-invoicing timetable to Parliament](#)
- ▶ [Turkiye increases additional customs duty rates on textile industry](#)



## EY Industry and Tax Services publications

### Industries

#### Private equity

- ▶ [Private Equity Pulse: Five takeaways from Q3 2023](#)

### Comments

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).

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