

Americas Tax Center Roundup

10 June 2019

Important announcement: Americas Tax Center Roundup moving to new EY delivery platform

The Americas Tax Center Roundup is now being sent out through EY's *Tax News Update: Global Edition* (GTNU) email subscription service. EY's GTNU is a free, personalized email subscription service that allows you to receive EY Global Tax Alerts, newsletters, event notifications and Thought Leadership published across all areas of tax (corporate, indirect, and personal).

For a short transitional period, we will be sending the ATC Roundup via **both** the GTNU and the current email distribution system, but we urge you to register for the GTNU platform as soon as possible (instructions available here) in order to continue receiving the Roundup.

If you have any questions, issues or comments, please email Global Tax News Update Help at globaltaxnewsupdatehelp@ey.com.

Latest news - Americas

US import tariffs on Mexico suspended indefinitely; tariff increase on certain China goods delayed

On 7 June, President Trump announced that tariffs he had intended to impose on Mexico would be suspended indefinitely. Eight days earlier, the President had announced that 5% punitive tariffs would be imposed on all goods imported from Mexico beginning 10 June, unless Mexico did more to curtail the illegal immigration at the US-Mexico border. The tariffs would have increased 5% monthly until reaching 25% on 1 October. With total imports from Mexico at approximately US\$346b, the immediate impact would have totaled approximately \$17b. An EY Global Alert is pending.

On 31 May, the US Trade Representative announced a limited extension to the scheduled additional tariff increase for goods from China, from 10% to 25% for certain goods covered by the Section 301 actions from 1 June to 15 June. A Tax Alert provides details.

EY's 2018–19 Worldwide Transfer Pricing Guide now available

Transfer pricing rules and regulations around the world continue to grow in number and complexity. **EY Worldwide Transfer Pricing Reference Guide 2018 -2019** is a publication designed to help international tax executives quickly identify transfer pricing rules, practices and approaches.

EY's Worldwide VAT, GST and Sales Tax Guide 2019 available

While greatly accelerating the pace of tax legislation, the world's governments have relied most heavily on indirect taxes for additional revenue. As a result, there is increased risk that taxpayers may be caught unprepared. EY's Worldwide VAT, GST and Sales Tax Guide provides country-by-country summaries of indirect tax systems in 124 jurisdictions.

The outlook for global tax policy and controversy in 2019

The outlook for global tax policy and controversy in 2019 is a survey of EY tax policy and controversy leaders in 48 jurisdictions. It covers known and forecasted tax changes in each jurisdiction, spanning all key tax types and including specific information on enforcement trends and key audit triggers.

EY publishes payroll-related guide for businesses expanding operations to the United States

In this increasingly global economy, more businesses are expanding their operations into the United States and raising questions about the employer obligations they will face. A new publication, *Employing staff in the US: A guide to employer obligations*, explains some of the relevant federal, state and local requirements involved in maintaining a US workforce including wage taxes, worker protections and immigration verification.

This week's tax treaty news in the Americas

- Argentina and Japan: investment protection agreement approved by Japanese House of Councillors
- **Brazil and United Kingdom:** exchange of information agreement entered into force

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General EY Publications

- Outlook for global tax policy and controversy in 2019 | 9th edition
- 2018-2019 EY Worldwide Transfer Pricing Reference Guide
- 2019 Worldwide VAT, GST and Sales Tax Guide
- 2018-19 Worldwide Personal Tax and Immigration Guide
- 2019 Global Oil and Gas Tax Guide
- NEW! 2019 Global Labor and Employment Law Strategic Topics: Ageism and the Workplace
- 2018 Worldwide Capital and Fixed Assets Guide
- 2018 Worldwide R&D Incentives Reference Guide
- 2018 Worldwide Estate and Inheritance Tax Guide
- 2018 Worldwide Corporate Tax Guide
- 2018 Worldwide Corporate Tax Guide Foreign currencies
- 2018 Indirect Tax updated worldwide developments map
- 2018 US EY Tax Guide

Tax Insights Magazine

Tax Insights Magazine is a series of publications, produced by EY, that will help you to gain a more thorough understanding of tax issues. It features the insights of high-level executives and professionals, as well as contributions from leading policymakers and academics.

- Canada and Israel: protocol to free trade agreement ratified by Canada
- Canada and Madagascar: treaty ratified by Canada
- Colombia and Japan: treaty approved by Japanese House of Councillors
- Ecuador and Japan: treaty approved by Japanese House of Councillors
- Paraguay and Uruguay: treaty entered into force

This week's EY Global Tax Alerts

Global Tax Alerts

- Report on recent US international tax developments 7 June 2019 (7 June 2019)
- Mongolia reforms its key tax legislation (7 June 2019)
- Mozambique grants tax debt relief (7 June 2019)
- US proposed regulations under IRC Sections 954 and 958 have important consequences for subpart F and GILTI regimes, among other provisions (7 June 2019)
- South African Revenue Service focuses on bad debt deductions during audits (4 June 2019)

Transfer Pricing Alert

 Greece broadens new incentives for the creation of shared services centers in Greece (7 June 2019)

OECD/BEPS Alerts

- The Latest On BEPS 3 June 2019 (3 June 2019)
- OECD workplan envisions global agreement on new rules for taxing multinational enterprises (3 June 2019)

Indirect Alerts

- New Zealand Government to "seriously consider" a Digital Services Tax (5
 June 2019)
- US announces new import tariffs on Mexico, delays tariff increase on certain China goods and formalizes removal of India from GSP (3 June 2019)
- Italian tax authorities start tax inspections aimed at assessing reinsurance fees as subject to VAT (3 June 2019)

Human Capital Alert

 Puerto Rico's Treasury Department extends deadline for requesting employee retention benefit related to Hurricanes Irma and Maria to June 30, 2019 (22 May 2019)

Upcoming webcasts

Enabling organic, commercial growth in a disruptive environment (14 June) EY's

recent survey of 500 C-level and senior executives shows a strong connection between profitable growth, customer-centric purpose and high-performance teaming. An upcoming webcast will discuss the survey results, including what executives see as the biggest obstacles to driving profitable growth and how organizations are prioritizing emerging technology investment.

Taxation of the digital economy: June 2019 update (18 June)

An upcoming webcast will focus on the OECD's workplan, which will address the tax challenges of the digitalized economy and will be released by the OECD in advance of the June G20 Finance Ministers' meeting. The panelists will discuss the OECD's current thinking, the views of key countries, and the status of the European Commission's work on digital taxation.

Recently archived webcasts now available on-demand

Transfer pricing controversy

Now more than ever, transfer pricing controversy is one of the most important topics in international tax law. A recent webcast provided a look at which transfer pricing issues are getting the attention of tax authorities, short, practical audit case studies and current transfer pricing tax court decisions.

Global trade disruption escalates to new heights

After a relatively quiet period of significant progress in trade negotiations between the US and its major trading partners, global trade is back in the headlines. This first webcast in a series dedicated to discussing ongoing trade disruption actions addressed the latest trade actions between the US and China, trade actions in Europe, as well as an update on other trade matters.

EY industry, service and issue publications

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Comments

If you have any questions or suggestions about this newsletter, please contact Amy Gist

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Forward to a colleague

Services

People and workforce

- Three things tax functions should prioritize in their investments
- How the gig economy complicates tax issues for countries and companies
- How do you prepare for careers that don't exist yet
- How to create a 'MAP' for success
- 2019 Global Labor and Employment Law Strategic Topics: Ageism and the

Workplace

• Five essentials for shadow payroll

Tax

- How powerful data analytics tools will become mandatory for companies
- How US tax reform is testing the life sciences sector
- Three ways blockchain can help implement smart contracts
- How digitalization is changing corporate income tax

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