

Americas Tax Center Roundup

17 June 2019

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

Latest news - Americas

OECD and country officials discuss OECD Workplan for new rules for taxing multinational businesses

The OECD's annual tax conference in Washington, DC, on 3-4 June 2019 provided an opportunity for OECD and G20 country tax officials to discuss the just-released OECD Workplan for reaching agreement on new international tax rules for multinational businesses. The proposals discussed could lead to significant changes to the overall international tax rules and go well beyond digital businesses and digital business models. In a related development, the G20 Finance Ministers and Central Bank Governors issued a communiqué, following their 8-9 June 2019 meeting in Fukuoko, Japan, that endorsed the OECD Workplan and welcomed ongoing progress.

For further discussion of the OECD Workplan, see the latest EY Global Tax Controversy flash news article, "Global debate over revisions to nexus and profit allocation rules affects all multinational business." Also see Upcoming Webcasts below for an 18 June webcast on the OECD Workplan.

Argentina amends tax binding inquiry system

The Argentine tax authorities have amended the binding inquiry (ruling) system for tax and social security purposes. Companies doing business in Argentina and foreign investors evaluating projects in Argentina should consider whether a ruling is needed before entering into a transaction, taking into consideration the facts and circumstances of their particular case.

Argentina amends transfer pricing local compliance obligations

The Argentine tax authorities have amended the transfer pricing compliance obligations, repealing several information reporting regimes. As a result, the obligation to file the monthly transfer pricing form (Form F 968) for transactions carried out in the domestic market with any related party no longer applies beginning with the July 2019 deadlines.

<u>Argentina issues tax regulations related to financing of real estate and infrastructure projects</u>

The Argentine Government has clarified the rules related to the financing of real estate and infrastructure projects. Companies doing business in Argentina and foreign investors evaluating projects in Argentina should review the new regulations and consider structuring alternatives for present and future projects.

EY Canada releases latest issue of TaxMatters@EY

TaxMatters@EY, a monthly bulletin prepared by EY Canada, provides a summary of recent Canadian tax news, publications, and resources. The June 2019 issue discusses: (1) Ontario's coming partial relief for estate tax administration, (2) the increase in digital tax administration and risks for boards to consider, and (3) a recent Tax Court of Canada decision on a taxpayer's eligibility to claim the disability tax credit based on severe mental impairment.

This week's tax treaty news in the Americas

- Brazil and Uruguay: tax treaty signed
- Colombia and Italy: Colombian Senate approved tax treaty

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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
- 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.

Ecuador and Italy: Italian Council of Ministers approved tax treaty protocol

This week's EY Global Tax Alerts

Global Tax Alerts

- Report on recent US international tax developments 14 June 2019 (14 June 2019)
- Argentina enacts promotional tax system for the knowledge-based economy (14 June 2019)
- Mauritius amends tax laws so certain land transactions are exempt from income tax (13 June 2019)
- US IRS proposes regulations on FIRPTA tax exception for qualified foreign pension funds' gain/loss attributable to certain interests in US real property (12 June 2019)
- Canada: Newfoundland and Labrador reintroduces budget 2019/20 (12 June 2019)
- Singapore and Korea sign revised income tax treaty (12 June 2019)
- Argentina issues tax regulations related to the financing of real estate and infrastructure projects (11 June 2019)
- Gibraltar announces 2019 budget (11 June 2019)
- South Africa publishes initial list of proposed corporate tax law amendments, focusing on anti-tax avoidance measures (11 June 2019)
- Argentina amends tax binding inquiry system (10 June 2019)

OECD/BEPS Alerts

- G20 Finance Ministers and Central Bank Governors welcome progress on addressing the tax challenges arising from digitalization and reiterate commitment to final solution by 2020 (11 June 2019)
- OECD and country officials discuss OECD workplan for new rules for taxing multinational businesses and ongoing projects (10 June 2019)

Transfer Pricing Alerts

- Singapore's Inland Revenue Authority releases transfer pricing guidelines for commodity marketing and trading activities (13 June 2019)
- Argentina amends transfer pricing local compliance obligations (11 June 2019)

Indirect Alerts

- New Zealand GST on low value imports to apply from 1 December 2019 (14 June 2019)
- Turkey amends certain provisions of the Customs Regulation (14 June 2019)
- Costa Rica announces proposed changes to the General Customs Law Regulation (14 June 2019)
- Poland postpones effective date of new SAF-T regime to 2020 (12 June 2019)
- US pauses implementation of sweeping tariffs on Mexico, approves new exclusions for certain products from Section 301 tariffs on imports from China (10 June 2019)

Upcoming webcasts

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.

EY industry, service and issue publications

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Automotive & Transportation

• How OEMs can achieve the best of both worlds

Insurance

Robust M&A activity helps fuel double-digit growth in insurance

Real Estate, Hospitality & Construction

How digital transformation opened new channels for growth

Services

Advisory

 How credit managers can improve reporting by better evaluating pricing providers

People and workforce

How US tax reform may carry hidden costs for workers

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- How procurement function's broader role draws tax officials' attention
- How GDPR compliance demands have shifted the focus to certification
- How governments approach tax collection is changing
- How tax administration is going digital
- Why there's global tax confusion about digital currencies
- How authorities are 'mining' for a single source of data
- How entrepreneurs refine their tax strategies
- Can thinking big keep your tax controversy small?

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Comments

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Forward to a colleague

- How businesses can use digital tools to improve indirect tax processes
- How digital disruption is changing value chains and tax

Issues

Growth

• How authorities are 'mining' for a single source of data

Managing Finance

• How insurers can understand, plan and prepare for the IBOR phase-out

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