



## Americas Tax Center Roundup

29 July 2019

## Important announcement: Register to receive Americas Tax Center Roundup via 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](mailto:globaltaxnewsupdatehelp@ey.com).

## Latest news - Americas

### EY publication highlights 2019 Q2 tax policy developments across the Americas

The second quarter of 2019 ushered in several significant tax policy developments across the Americas. *Americas Tax Policy Update* highlights the top tax policy developments from April through June 2019. Highlights in this edition include:

- Tax reform proposals in Brazil
- Modifications to Chile's tax reform proposal
- Guidance on the recently enacted tax reform in Colombia
- Mexico's new tax collection program

### Brazil and OECD present study on alignment of Brazil's transfer pricing rules with OECD guidelines

Brazil's Federal Revenue Department (*Receita Federal do Brasil*, or RFB) and the OECD have presented the outcome of a study related to the alignment of Brazilian transfer pricing rules with the OECD guidelines. The project was launched in February 2018 with the goal of evaluating Brazil's tax environment, focusing on the administrative and legal aspects of transfer pricing. Brazil must now decide how it will align with the OECD's transfer pricing guidelines.

### OECD releases update on peer review of preferential tax regimes and no or only nominal tax jurisdictions

The OECD has released an update on the results of the peer reviews of jurisdictions' domestic laws under Action 5 (harmful tax practices) of the OECD/G20 BEPS Project. The assessments, undertaken by the OECD's Forum on Harmful Tax Practices, look at preferential tax regimes and the "substantial activities factor" for no or only nominal tax jurisdictions. The updated results cover 56 regimes, bringing the number of regimes that have been reviewed, or are under review, to 287. This latest release underscores the swift and geographically comprehensive progress being made on the implementation of BEPS Action 5 on harmful tax practices.

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## General EY Publications

- [Worldwide Digital Tax Guide](#)
- [2019 Outlook for global tax policy and controversy | 9th edition](#)
- [2019 Worldwide Corporate Tax Guide](#)
- [2018-2019 EY Worldwide Transfer Pricing Reference Guide](#)
- [2019 Worldwide VAT, GST and Sales Tax Guide](#)
- [2019 Indirect Tax – updated worldwide developments map](#)
- [2019 Global Oil and Gas Tax Guide](#)
- [2019 Worldwide Capital and Fixed Assets Guide](#)
- [2019 Worldwide Estate and Inheritance Tax Guide](#)
- [2018-19 Worldwide Personal Tax and Immigration Guide](#)
- [2018 Worldwide R&D Incentives Reference Guide](#)
- [A complete list of EY Tax Guides](#)

## Puerto Rico's new Incentives Code includes various tax incentives for investments in opportunity zones

The Governor of Puerto Rico has signed into law the Puerto Rico Tax Incentives Code, which consolidated dozens of tax decrees, incentives, subsidies, and tax benefits in a single statute. The Incentives Code codified most of the provisions establishing various tax incentives in Puerto Rico for investments in qualified opportunity zones. The opportunity zone provisions are intended to align local tax statutes with the benefits afforded under the US Tax Cuts and Jobs Act and aim to make Puerto Rico's market more appealing for investors.

## Certain Argentine taxpayers subject to integral adjustment for inflation for local income tax purposes

In April, May, and June 2019, interannual inflation exceeded 55% in Argentina, which means companies that close their last tax year in one of those months must apply the integral adjustment for inflation for income tax purposes to those tax years. When companies apply the integral inflation adjustment mechanism, they must allocate one-third of any resulting negative or positive inflation adjustment to the tax year to which it corresponds, and the remaining two-thirds, in equal parts, to the following two tax years.

## EY's 'Corporate and Commercial Law – global update' reviews legal news in Americas and beyond

EY's *Corporate and Commercial Law – global update* highlights recent and noteworthy legal news in a variety of jurisdictions around the world. This edition includes information on: (1) Argentine crowdfunding regulations, (2) Brazilian data-protection legislation, and (3) Mexican disclosure obligations for commercial companies

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

- **Central America and UK:** trade continuity agreement signed by UK and Central American countries of Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, and Panama
- **MERCOSUR (Argentina, Brazil, Paraguay, and Uruguay) and South Korea:** free trade agreement negotiations held
- **Mexico and Indonesia:** Indonesia ratified tax treaty protocol

### This week's EY Global Tax Alerts

#### Global Tax Alerts

- [Report on recent US international tax developments - 26 July 2019 \(26 July 2019\)](#)
- [The Netherlands publishes draft proposal on Mandatory Disclosure Rules \(26 July 2019\)](#)
- [South Africa: Review of new anti-dividend stripping rules \(26 July 2019\)](#)
- [South African Government releases 2019 Tax Law Amendment Bills \(26 July 2019\)](#)
- [French President signs bill on Digital Services Tax and partial freeze of corporate income tax rate decrease \(25 July 2019\)](#)
- [US proposed regulations on passive foreign investment companies have implications for insurance companies \(25 July 2019\)](#)
- [Certain Argentine taxpayers are subject to integral adjustment for inflation for local income tax purposes \(25 July 2019\)](#)
- [Bangladesh enacts 2019-20 budget proposals \(25 July 2019\)](#)
- [Philippines implements the Apostille Convention to eliminate authentication of foreign documents \(25 July 2019\)](#)
- [UK publishes draft legislation and consultation paper on EU Mandatory Disclosure Regime \(24 July 2019\)](#)

#### 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 policy-makers and academics.

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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

- [Ireland publishes Tax Strategy Group papers – Budget 2020 \(23 July 2019\)](#)
- [Turkish law including amendments on Income Tax Law, Corporate Tax Law and Customs Law has entered into force \(22 July 2019\)](#)
- [Malaysia publishes updated Guidelines on Taxation for e-Commerce Transactions \(22 July 2019\)](#)
- [Puerto Rico’s new Incentives Code includes various tax incentives for investments in opportunity zones \(22 July 2019\)](#)

### OECD/BEPS Alert

- [OECD releases update on peer review of preferential tax regimes and no or only nominal tax jurisdictions \(24 July 2019\)](#)

### Transfer Pricing Alerts

- [Brazil and OECD present study on alignment of Brazil’s transfer pricing rules with OECD guidelines \(24 July 2019\)](#)
- [Botswana publishes transfer pricing regulations \(23 July 2019\)](#)

### Indirect Alerts

- [Mauritius Assessment Review Committee considers “intended use” to determine HS code classification \(26 July 2019\)](#)
- [Saudi Arabia amends VAT regulations \(25 July 2019\)](#)

### Human Capital Alerts

- [Kenya introduces mandatory tax compliance certificates for work permit applications \(22 July 2019\)](#)
- [Netherlands requires additional proof for the 30% tax free allowance facility \(22 July 2019\)](#)
- [France publishes decree for opting out of statutory pension contributions \(22 July 2019\)](#)

## EY industry, service and issue publications

### Industries

Business transformation in wealth and asset management

- [Why your digital transformation requires a winning data strategy](#)

### Services

Tax

- [TradeWatch - Summer 2019](#)

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- [How to enhance risk oversight in an age of transformation](#)

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