

CFE's Tax Top 5

KEY TAX NEWS OF THE WEEK

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CFE Celebrates 60th Anniversary in Torino

Under the high patronage of the European Parliament, CFE Tax Advisers Europe celebrated its 60th Anniversary with a series of events, including General Assembly, the inaugural Global Tax Advisers Platform conference and technical committee meetings held over three days in Torino, Italy, hosted by the Italian member organisations of CFE - Associazione Nazionale Tributaristi Italiani (ANTI) & Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC).

CFE President Piergiorgio Valente welcomed the delegates and high-level guests, and thanked the Member organisations of CFE, the Italian host member organisations, and the delegates for their commitment and their continuous support in achieving the goals and objectives of CFE Tax Advisers Europe over the many years.

Pascal Saint-Amans, Director of the OECD Centre for Tax Policy and Administration addressed the General Assembly, highlighting the long-standing collaboration between the CFE and the OECD. Mr Saint-Amans said that CFE has been an active contributor to OECD's work since its inception in 1959 - only a few years before the publication of the 1963 OECD Model Tax Convention. Mr Saint-Amans welcomed CFE's recent contributions to OECD's public consultations and presented the upcoming OECD agenda on the taxation challenges of the digital economy.

Representing the European Commission, Bert Zuijndendorp discussed the important role that stakeholders like CFE play in the taxation policy initiatives of the EU. Mr Zuijndendorp also reflected on the synergy of the work undertaken by the OECD and the EU.

In a written contribution for the CFE's 60th Anniversary, Mr Valère Moutarlier, Director of Direct Taxation, European Commission said: *"CFE has been a prominent and constructive actor in the EU's tax arena for many years now. Its contributions to consultations, its submission of well-researched position papers and its membership in the Platform on Tax Good Governance are just a few of the ways in which it has brought its views and ideas to our attention. This Commission relies heavily on vocal, active and knowledgeable stakeholders for well-informed policy-making and CFE certainly meets this description. As we move forward now, towards a new mandate and a renewed agenda for taxation policy in Europe, I am sure that CFE will continue to liaise closely with the Commission and make its mark."*

The CFE Tax Advisers Europe was honoured to receive the patronage of the European Parliament of its 60th Anniversary, confirming the close links between the objectives of CFE’s initiatives and the values of the European Union. In a written statement, the President of the European Parliament, Mr David Sassoli, said: *“The institution I have the honour to preside over greatly appreciates the professional and committed work of your organisation. The European Parliament very much admires the aim of your initiative, which is to present the goals of your organisation from its beginnings 60 years ago and to examine the close relationships forged with the European institutions over the years. It also highly values your activity as an important partner in the last European elections campaign.”*, the European Parliament president said.

More information on CFE’s Anniversary is available on the [CFE website](#).



OECD to Issue New Digital Tax Proposals on Wednesday

Speaking at the CFE events in Torino, the Director of the OECD Centre for Tax Policy and Administration, Pascal Saint-Amans confirmed that the new Secretariat proposals concerning the taxation challenges of the digital economy will be published on Wednesday, with an upcoming public consultation scheduled for 21-22 November.

The proposals will outline the so-called ‘unified approach’, which will likely centre on a framework that is relying on the arm’s length principle for the traditional company transactions and a formulary method for apportionment of the residual profits.

More detail will be released on Wednesday – save the date and [register](#) for the upcoming OECD Tax Talks on 9 October.



Global Tax Advisers Platform Issues Torino-Busan Declaration

On 3 October, on the occasion of the Global Tax Advisers Platform (GTAP)’s inaugural conference in Turin, the GTAP founding bodies issued the Torino-Busan Declaration. In this document, GTAP sets out four key short-term priorities to pursue its fundamental purpose: the promotion of public interest by ensuring the fair and efficient operation of national and international tax systems.

The four priorities highlighted in the Declaration are:

- Tax for Growth;
- Sustainable Tax Policies;
- Tax and Digitalisation;
- Taxpayers’ Rights and Certainty in a Fast-Paced World.

We invite you to read the [Press Release](#) for further information about the Torino-Busan Declaration. A copy of the document will be made available on the CFE website in due course.



EU Commissioner-Designate for Economy Approved at European Parliament Hearing

Paolo Gentiloni, Commissioner-Designate for the Economy (responsible for taxation) was approved at the [Committee on Economic and Monetary Affairs hearing](#) which took place on 3 October. During the hearing, Mr Gentiloni vowed that tax issues would be top of the agenda, with plans to introduce a carbon tax, fuel tax, and pursue taxation of the digital economy should international agreement at OECD level fail. Other priorities include the common consolidated corporate tax base, modifying the way in which decisions in taxation matters are taken by making use of Paserelle clauses to allow for qualified majority voting, creating a fraud proof and future proof VAT system, and making full use of the list of non-cooperative jurisdictions on tax matters to combat harmful tax regimes.

Plenary will vote on whether or not to elect the Commission as a whole on 23 October.



Platform for Collaboration on Tax Issues Draft Transfer Pricing Toolkit

The Platform for Collaboration on Tax, a joint initiative of the IMF, OECD, UN and World Bank Group, has issued a [draft toolkit](#) designed to help developing countries in the implementation of effective transfer pricing documentation requirements. The toolkit considers current approaches of tax administrations concerning documentation for transfer pricing analysis and policy matters that may give guidance to developing countries.

The Platform for Collaboration on Tax are seeking input on this draft of the toolkit by 8 November 2019. Particular points concerning which the Platform is seeking input include: whether the draft toolkit addresses all the relevant considerations for the design of an effective transfer pricing documentation regulatory system; whether particular approaches (e.g. penalties or compliance incentives) are especially beneficial for limited capacity developing countries, in terms of enforcement of transfer pricing documentation; whether there other transfer pricing documentation requirements not covered in this toolkit that should be considered; and what additional considerations and/or tools can be included to assist developing countries to implement effective transfer pricing documentation.