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EU Commission Considers Leniency for DAC6 Reporting Deadlines

The EU Commission is [reportedly](#) considering “a possible adjustment” for deadlines imposed by the EU Directive on mandatory disclosure rules (“DAC6”). This follows on from public requests made by [financial](#) and [professional association organisations](#), seeking leniency in the enforcement of penalties and deadlines contained within the Directive due to the extraordinary consequences of the COVID-19 outbreak which have resulted in severe disruption across the European economy.

CFE Tax Advisers Europe in its [Opinion Statement](#) on the issue highlighted that many intermediaries and taxpayers will face exceptional challenges and business pressures in seeking to fulfil the obligations arising out of the Directive, and that Member states’ tax administrations will be similarly hampered to issue guidance specifying the practical application of the rules. CFE urged a positive intervention by the Council of the EU and the European Commission to mitigate the challenges faced by intermediaries in such circumstances, to allow leniency for Member States to delay the enforcement of penalties related to compliance with national DAC6 implementing legislation.

A spokesperson for the Commission [reportedly](#) stated that “*any postponement should thus be of a limited duration and will not affect the start of application of the directive [on July 1, 2020],” the spokesperson said. “It follows that cross-border reportable arrangements made during any agreed deferral period would in any case have to be reported once the deferral period is terminated.”*



OECD: COVID-19 an Opportunity for Digitalisation

The OECD has published a [blogpost](#) concerning the opportunities for subnational governments to deliver public services and collect revenue by way of digital means in light of the coronavirus crisis. The post emphasises that “*Fighting a pandemic while minimising the associated economic costs calls for appropriate digital infrastructure for the design and enforcement of containment measures, as well as to ensure access by the population and enterprises to critical government services.*”

The post discusses the uses of geographic information systems, to control road and railway traffic, maintain regional or local infrastructure, and monitor water and sanitation usage,

digital portals, to deliver public services and collect revenue, digital health care services, as well as the impact of financial resources and infrastructure of subnational governments in achieving progress in the digitalisation process.



EU Tax Academics Call for EU Solidarity Taxes

A group of prominent EU tax law academics have published an [op-ed](#) calling for the introduction of EU taxes in order to strengthen EU solidarity in the wake of the economic impact within the EU due to the COVID-19 outbreak. The group suggest that *“the present financing mechanism is replaced by a truly European mechanism of limited solidarity, in accordance with the common European ability to pay... a vote of confidence in the democratic European institutions, that they will be able to tax and spend well in the interests of the Union, which will benefit all Member States.”*

The op-ed cautions their manifesto is *“not a call for higher taxation, but in the first place for a limited and gradual shift in revenue between the Member States and the Union. This reform is not to be implemented in one big bang, but in a gradual process during a long transition period, like the customs union from 1957 to 1968. To keep the Union together we need that minimal glue of truly European solidarity, not more but surely not less.”*

Although CFE delegates and associates have been involved in the drafting of the manifesto, the content does not necessarily reflect CFE views on the matter.



OECD Publishes Taxing Wages 2020 Report

On 30 April 2020, the OECD will make public its annual flagship report on the rates of tax levied in OECD countries on the wages and salaries of citizens, [Taxing Wages 2020](#).

The report will examine rates of taxation and compare, as a percentage share of gross salary, income tax and social security contributions made by employees, social security contributions and payroll taxes paid by employers, as well as any cash benefits received. In addition, the report will examine taxes at a household level, comparing rates of taxes across different pay levels and amongst different family configurations, such as families with and without children, and across those households with either single or multiple incomes.

Those wishing to read the report will be able to access it using this [link](#) after it is released.



Albert Rädler Medal 2019: CFE Announces Winner of Academic Excellence Award

CFE Tax Advisers Europe is proud to announce that the Albert J Rädler Medal Award 2019 for academic excellence in European taxation has been awarded to Mr William Criminisi of the Luigi Bocconi University for his Master’s thesis entitled *“Hybrid Mismatch Arrangements in International Tax Law”*.

The CFE Albert J Rädler Medal Award was launched in 2013 to encourage academic excellence among young tax students in the field of European taxation, and to recognise the outstanding contribution to the field of taxation of the late Professor Albert J Rädler.

The CFE Academic Jury, composed of Prof. Dr Pasquale Pistone, Prof. Dr Michael Lang and Prof. Dr Otmar Thömmes, stated of the thesis that *“Mr Criminisi’s manuscript provides with a comprehensive and in-depth analysis of a very technical topic, such as hybrid mismatch arrangements, supported by comparative legal analysis. The focus on the implementation of BEPS related measures through the ATAD also takes into account the compatibility of the latter with primary law of the European Union. The proposal for issuing secondary EU legislation aligned with IAS/IFRS is constructive and formulated with due consideration of its technical implications and side repercussions.”*

The CFE Executive Board and CFE Academic Jury warmly congratulates Mr Criminisi, and wish him the best in his future career.