



BRUSSELS | 26 APRIL 2022

EU Parliament Tax Subcommittee: Hearing on Regulating Intermediaries

On 25 April 2022, the European Parliament's Permanent Subcommittee on Tax Matters held a [hearing](#) concerning regulation of the provision of tax advice across the European Union, *"How to reinforce the regulation of intermediaries to create an intermediary sector that ensures a fair and user-friendly tax system?"*. The hearing was a follow-up to a hearing held in November 2021 concerning the Pandora Papers, tax evasion and tax avoidance. Members of the Subcommittee discussed the the role of tax intermediaries in tax avoidance and tax evasion and evaluated options to improve tax intermediaries' regulatory framework to deter them from playing any part in tax abusive activities.

The hearing featured interventions by Ms. Khadija Sharife, Senior Editor for Africa at the Organized Crime and Corruption Reporting Project (OCCRP), Mr. Grant Wardell-Johnson, KPMG Global Tax Policy Leader and Chair of the Global Tax Policy Leadership Group (accompanied by Ms. Raluca Enache, Director at KPMG EU Tax Centre, KPMG in The Netherlands), Mr. Aleksandar Ivanovski, Director of Tax Policy at CFE Tax Advisers Europe (accompanied by Ms. Brodie McIntosh, Tax Policy Analyst at CFE Tax Advisers Europe) and Prof. Emer Mulligan, Professor in Taxation and Finance at the National University of Ireland, Galway.

Aleksandar Ivanovski and Brodie McIntosh gave a presentation concerning the CFE [Discussion Paper on An Ethics Quality Bar for All Advisers](#), which sets out a proposed Ethics Quality Bar for advisers to reflect on when giving advice, questioning whether there is manipulation and artificiality in tax planning. The CFE's Professional Affairs Committee prepared this paper based on its long-standing commitment to high professional standards in tax advice and to stimulate a discussion on how to tackle this problem among all who have an interest in how our tax systems function in Europe.

Ms Jasna Voje from DGTAXUD at the European Commission also participated in the discussion, and informed attendees that a public consultation will be launched in mid-May exploring policy options being considered by the Commission to improve tax intermediaries' regulatory framework.

[Register Now: CFE Forum 2022 on 12 May 2022 in Brussels](#)

CFE Tax Advisers Europe's [2022 Forum](#) will be held on 12 May 2022 in Brussels on the topic of *“The Future of Holding Companies & VAT Grouping in the Current Tax Policy Climate”*. The conference will examine issues

surrounding the European Commission's Unshell Proposal and how policy developments affect the use of holding companies and VAT groups across tax structures.

Key-note on EU's Unshell proposal will be provided by Benjamin Angel, Director, DG TAXUD, European Commission. Speakers from a wide range of stakeholder perspectives will examine issues raised by the Commission's proposal, legitimate uses of holding companies, and problems with the divergence in approaches throughout the EU on VAT grouping. More details about the programme, line-up of speakers and the registration link for the event is available [here](#).

OECD Public Consultation Meeting on Minimum Tax Implementation Framework

On 25 April, the OECD held a public consultation meeting concerning the Implementation Framework of Pillar 2, following the release of the [Global Anti-Base Erosion \(GloBE\) Rules](#) as part of a landmark agreement on a two-pillar solution and the related [Commentary](#), and the consultation on the Implementation Framework for the Rules.

The public consultation meeting consisted of panel discussions on: perspectives on implementation priorities; information reporting and exchange; simplifications and safe harbours, and co-ordination and tax certainty. Panelists discussed the input received by the OECD on the implementation framework and how best to ensure that tax administrations and MNEs can implement and apply the GloBE Rules in a consistent and co-ordinated manner.

The consultation is available to watch on replay [here](#).

Irish Tax Institute & Harvard Kennedy School Global Tax Conference, 17 & 18 May 2022

The Irish Tax Institute (ITI), a CFE Tax Advisers Europe Member organisation from Ireland, alongside the Harvard Kennedy School, Ash Centre for Democratic Governance and Innovation, are co-hosting a virtual Global Tax Policy Conference on 17 and 18 May 2022 from 14:30 – 17:30 CEST.

Over the two days, expert speakers will discuss developments in the OECD Inclusive Framework process, tax administration in a digitalised world, tax and climate change, and what the next 5 years might look like for tax policy across the globe. The programme and panel speakers can be viewed [here](#).

Registration is now open via this [link](#).

OECD Invites Input on Extractives Exclusion Under Pillar 1

The OECD is inviting input until the end of the week, 29 April, on a [consultation](#) concerning the *Extractives Exclusion* under Amount A of Pillar One of the Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy. In addition, the public input received concerning the draft rules for scope under Pillar One Amount A have also been [published](#).

As per the consultation document, "*The Extractives Exclusion will exclude from*

the scope of Amount A the profits from Extractive Activities. The exclusion applies where a Group derives revenue from the exploitation of Extractive Products and the Group has carried out the relevant Exploration, Development or Extraction. This approach reflects the policy goal of excluding the economic rents generated from location-specific extractive resources that should only be taxed in the source jurisdiction, while not undermining the comprehensive scope by limiting the exclusion in respect of profits generated from activities taking place beyond the source jurisdiction, or later in the production and manufacturing chain."

Input can be submitted in Word format up until 29 April 2022 by email to tfde@oecd.org, addressed to: Tax Treaties, Transfer Pricing and Financial Transactions Division OECD/CTPA.

The selection of the remitted material has been prepared by:
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