



CFE Annual Report

2019

MEMBER ORGANISATIONS / OBSERVERS / STANDING GUEST IN 2019

CFE is an umbrella organisation representing the tax profession in Europe. On 31 December 2019, our members comprised 33 professional organisations from 26 European countries, representing more than 200,000 individual members, and 1 standing guest organisation from Uzbekistan. Our functions are to safeguard the professional interests of tax advisers, to assure the quality of tax services provided by tax advisers, to exchange information about national tax laws and professional law, and to contribute to the coordination of tax law in Europe.

	AT Kammer der Steuerberater und Wirtschaftsprüfer (KSW)		PT Associação Portuguesa de Consultores Fiscais (APCF)
	BE Institut des Experts-Comptables et des Conseils Fiscaux / Instituut van de Accountants en de Belastingconsulenten		RO Camera Consultanților Fiscali (CCF)
	CH EXPERTsuisse		SI Zbornica Davcnih Svetovalcev Slovenije (ZDSS)
	CZ Komora daňových poradců ČR (KDPČR)		SK Slovenská komora daňových poradcov (SKDP)
	ES Asociación Española de Asesores Fiscales (AEDAF) Registro de Economistas de Asesores Fiscales (REAF)		SM Ordine dei Dottori Commercialisti e degli Esperti Contabili (ODCEC)
	FI Suomen Veroasiantuntijat ry (Association for Finnish Tax Professionals)		UA The Union of the Tax Advisers of Ukraine
	FR Institut des Avocats Conseils Fiscaux (IACF)		UK The Chartered Institute of Taxation (CIOT) Tax Faculty – Institute of Chartered Accountants in England and Wales (ICAEW)
	HR Hrvatska Komora Poreznih Savjetnika (HKPS)		
	IE The Irish Tax Institute (ITI)		
	IT Associazione Nazionale Tributaristi Italiani (ANTI) Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC)		
	LU Ordre des Experts-Comptables (OEC)		
	LV Latvijas Nodokļu Konsultantu Asociācija		
	MT Malta Institute of Taxation (MIT)		
	NL Register Belastingadviseurs (RB) De Nederlandse Orde van Belastingadviseurs (NOB)		
	PL Krajowa Izba Doradców Podatkowych (KIDP)		
		Observers:	
			LT Association of Lithuanian Tax Advisers
			ME Institute of Accountants and Auditors of Montenegro
			NL De Nederlandse Vereniging van Advocaten-Belastingkundigen (NVAB)
			RS The Association of Tax Advisors of Serbia
			RU Palata Nalogovych Konsultantov (Chamber of Tax Advisers)
			SI Tax Advisory Chamber of Slovenia (DSZS)
		Standing guest:	
			UZ The Chamber of Tax Advisers of Uzbekistan



Signature of the Torino – Busan Declaration



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**Bert Zuijndorp**Head of Unit for Company Taxation Initiatives
European Commission

It is a real honour to be invited to write the foreword to the CFE annual report on the occasion of the organisation's 60th anniversary. I congratulate CFE and your members on yet another productive year.

As 2019 draws to a close and a new European Commission takes office, it presents us a good opportunity to look back at the developments of the recent past and reflect.

While there was no EU agreement on a Digital Tax in 2019, the discussions and policy development continue in Brussels and Paris. Progress is being made towards reaching a global consensus and this will be built on in 2020. Negotiations also continued at a technical level on the Common Consolidated Corporate Tax Base, and the EU Finance Ministers agreed on the first major update to the EU list of non-cooperative jurisdictions in tax matters. The EU list has presented itself as one of the real success stories of the outgoing Commission and we can expect its influence on the international tax landscape to continue in the years to come.

Meanwhile our Member States have been busy transposing the large volume of tax law that was agreed within the EU in the past five years. By the end of 2019, they will have completed implementation of the Anti Tax Avoidance Directives and the Directive on Mandatory Disclosure Rules.

It appears that tax continues to be "front page" news, and judging from the political guidelines of the new Von der Leyen Commission, this shows no signs of changing anytime soon.

Looking forward, President Von der Leyen has made it clear that fair taxation will be a priority policy area for the new Commission. As indicated in the political guidelines, if there has not been a global agreement on digital tax, then we can expect further action at EU level. Our new tax Commissioner, Paolo Gentiloni, has also been entrusted with making the Directive for a Common Consolidated Corporate Tax Base a reality. This proposal, once agreed by the Member States, will provide businesses with a single rulebook to compute their corporate tax base in the European Union. Commissioner Gentiloni will work closely with Executive Vice-President Timmermans on the tax aspects of the European Green Deal. We can also expect to see stronger measures to deal with non-EU harmful tax regimes. In this regard, the EU list of non-cooperative jurisdictions in tax matters will continue to play an important role.

Finally, I would like to wish the CFE organisation and all of its members the very best in 2020. We look forward to continue to work closely together with you, and all our stakeholders, as we navigate this busy tax policy agenda together.

Bert ZuijndorpHead of Unit for Company Taxation Initiatives
European Commission



Massimo Miani

President, Consiglio Nazionale dei Dottori Commercialisti e Degli Esperti Contabili (CNDCEC), Italy

I was honoured to be asked by the President of CFE Tax Advisers Europe, Piergiorgio Valente, to contribute to the CFE Tax Advisers Europe Annual Report for 2019 by writing a Foreword.

2019 has been a remarkable year of collaboration for the Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili with CFE Tax Advisers Europe. We were thrilled to co-host the CFE General Assembly in 2019 together with the Associazione Nazionale Tributaristi Italiani (ANTI), at which CFE Tax Advisers Europe celebrated its 60th Anniversary with a series of events. These events included the inaugural Global Tax Advisers Platform Conference, the CFE General Assembly and CFE Technical Committee Meetings, held over three days in Torino, Italy, on 3 and 4 October 2019. We were also pleased to host the Welcome Reception at Il Palazzo Della Luce, and the Gala Dinner at Villa Sassi, in very unique and historic destinations in Turin, both of which were extremely memorable events.

It was an honour for our organisation to have Pascal Saint-Amans, Director of the OECD Centre for Tax Policy and Administration present at the events we co-hosted, and to have him address the General Assembly on CFE and OECD collaboration. It was also a privilege to have Bert Zuijndendorp, Head of Company Taxation Initiatives, DG TAXUD, representing the European Commission at the events, discussing stakeholder collaboration with the EU, and the significant contributions CFE had made throughout the years.

In addition, this year CFE Tax Advisers Europe and the Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili also entered into an important collaboration to co-produce online

courses on topics concerning European and international taxation. These courses are available on an e-learning platform in Italy for CNDCEC members and have been a great success for our organisation. Further courses will be recorded in 2020, continuing this important collaboration with CFE Tax Advisers Europe and its CFE Academy.

The events of 2019 signalled to CNDCEC the importance of inclusive co-operation throughout the tax profession, and the very urgent need for a single representative voice of tax professionals in Europe. We thank CFE Tax Advisers Europe for its role in a very memorable and successful year for CNDCEC, and look forward to ensuring our two institutions will enjoy even further enhanced cooperation in the years to come.

Massimo Miani

President, Consiglio Nazionale dei Dottori Commercialisti e Degli Esperti Contabili (CNDCEC), Italy



Piergiorgio Valente
President of CFE Tax Advisers Europe

New EU Beginnings

It is without any doubt that the Juncker Commission left behind a renovated landscape in the EU tax area. Similarly, it is largely agreed that the changes moved the state of play in the right direction.

The outgoing Commission was the Commission of the Base Erosion and Profit Shifting (BEPS) Project. While this has been an international initiative, its implementation at EU level in a coordinated manner has been a challenge on its own that required a series of legislative initiatives, including the Anti-Tax Avoidance Directive and amendments to the Directive on Administrative Cooperation in the field of taxation (DAC). In addition, the EU can boast that it exceeded and enhanced the international standard in the fight against BEPS and the promotion of good tax governance at global level, e.g. through the EU listing process.

Apart from BEPS, the outgoing Commission delivered important improvements in the field of international cooperation between the tax authorities of Member States. This was achieved through the widening of the scope of DAC, enabling new sources of information and ensuring that they reach all relevant tax authorities. The landscape looks indeed more transparent than ever before. Equally, tax dispute resolution has been enhanced beyond precedent with the adoption of the Directive on tax dispute resolution mechanisms. The important coordination in the VAT area is also in the positive side of the account with significant implications for the competitiveness of the Single Market.

Nevertheless, the outgoing Commission was far more ambitious. Evidence of this are two key initiatives that are pending and shall be for the next Commission to assess:

- The relaunch of the Common Consolidated Corporate Tax Base in a 2-step adoption process;
- The Digital Tax Package to address the issue of taxation of the digital economy in a coordinated manner across the Single Market.

Having in mind those goals which were met, and those which still are not, it is an appropriate time to consider EU taxation in the future.

For such an endeavor, due weight must be attached to the global context, the rising powers, the value of information, as well as to broad policy concerns, such as climate change. Three key areas can be identified as priorities:

- Tax certainty;
- Tax competitiveness;
- Interaction between tax and other policy issues.

First, tax certainty. Although it has been an acknowledged priority in the last years, it can still not be taken as a given. In fact, it is commonly agreed that tax certainty is undermined in the EU. The number of fiscal State aid cases opened by the outgoing European Commission serves as an argument in this respect. Irrespective of the merit of the decisions taken by the Commission in the aftermath of its investigations, the result has been to cast doubt on Member States' decisions and practices established for the very purpose of strengthening tax certainty. Streamlining the fiscal State-aid front cannot but be a priority in the next years to improve certainty and predictability in the Single Market and build mutual trust between EU institutions and Member States. It is even more important in a tax landscape that is being overhauled around the world.

Second, the EU has always sought to increase the competitiveness of the tax environment and it has won many of the battles it has fought. Yet, the war is not over: the EU tax framework remains significantly fragmented, especially in the direct tax area. Further coordination is necessary to achieve this aim. Compromise is often the sole way to achieve progress.

Third, tax is a key parameter and incentive for the promotion of sustainable growth. It cannot and must not be viewed in isolation from broader policy areas or as an end in itself. Instead, it could and should be the means to incentivise the construction and maintenance of a sustainable environment where humanity can flourish. Indicatively, tax incentives for environment friendly technologies and/or practices could be used more widely at EU level, under the climate change threat.

To conclude, the new Commission shall inherit high standards

and important responsibilities. In a controversial political and tax environment, it shall be called to take up the challenge to envision and shape the EU taxation of the future.

Geo-taxation and Digitalisation

Under the designation 'taxation of the digital economy' we are witnessing perhaps the most fundamental change in the design and modus operandi of the international tax system. This will modify the tax system largely based on a network of bilateral double taxation treaties, originally developed by the League of Nations in 1928. Whilst the tax treaties remain bilateral, the context in which we operate in is increasingly multilateral.

The current era is marked by a multitude of global players and by an unprecedented synergy of cooperation policies. The international tax governance network is obtaining new members: the OECD with the extended BEPS Inclusive Framework, and the UN Committee of Tax Matters. Other institutions who weigh-in on international tax policy debate are joining all of them. Such institutions are the World Bank, the International Monetary Fund, and the European Union. Increasingly, national tax authorities cooperate more closely at the international level by creating initiatives such as 'Tax Inspectors Without Borders', joint tax inspections and audits, and work together on multilateral advance pricing agreements. As a result, both the challenges and opportunities are increasingly globalised. This fast-paced change places enormous pressure on the tax profession, as well as the existing cooperation framework mechanisms and tax cooperation possibilities.

As a response to the globalised tax governance environment, I would like to promote the Global Tax Advisers Cooperation Platform (GTAP). GTAP was established by CFE Tax Advisers Europe, AOTCA and WAUTI, who collectively represent more than 600,000 tax advisers in Europe, Asia and Africa. GTAP is an international platform that seeks to bring together both national and international organisations of tax professionals from all around the world. GTAP serves a unique purpose: to encourage tax professionals to take up the challenge of proposing a new system. This system must be simple, flexible, fit for purpose, and able to reclaim taxpayers' confidence.

Piergiorgio Valente

President of CFE Tax Advisers Europe



Stella Raventós-Calvo, Wolfgang Mederer, Roberta Grappiolo and Eleftheria Psaraki



Elizabeth Brito, Jos Goubert, Isabelle Richelle and Jeremy Woolf



Fiscal Committee meeting in Torino



Fiscal Committee meeting in Brussels

Fiscal Committee

Overview

CFE's Fiscal Committee is comprised of two Sub-Committees: the Direct Taxes Subcommittee and Indirect Taxes Subcommittee, which focus on monitoring and responding to developments in tax policy and tax law at both European and international level. The Fiscal Committee aims to provide members with a cohesive view of the current state of affairs in tax policy by providing detailed analyses and updates concerning the work of the EU, OECD and UN.

Member and observer organisations nominate delegates who attend the Fiscal Committee's technical meetings and are contacted on a regular basis concerning developments in taxation policy. The views communicated to CFE by those delegates concerning the developments are then represented in CFE's opinion statements and outreach work in both European and international tax fora.

Activities

In 2019, the occurrence of the European elections posed an excel-

lent opportunity for the CFE Fiscal Committee to reflect upon and identify the various tax policy issues which it considered to be most relevant to the interests of its members for the next Commission Mandate. Much of the Committee's work focussed on prioritising future contributions to tax policy developments emanating from the EU Commission, OECD and UN. The means by which the Fiscal Committee carries out the work relating to its priorities include the following activities:

- Monitoring relevant tax policy developments at both European and international level;
- Reviewing legislative developments and monitoring progress within Member States on the implementation of tax reforms, particularly concerning the Anti-Tax Avoidance Directives of the European Commission;
- Distributing updates and questionnaires to delegates concerning tax matters of particular importance;
- Publishing Opinion Statements setting out the views of the Fiscal Committee on tax policy developments, many of which have been republished in leading tax journals in Europe;
- Engaging with European Commission, European



Gary Ashford



Fiscal Committee meeting in Brussels



Miriam Galandová and Anne Gunnell



Stella Raventós-Calvo and Wolfgang Mederer

Parliament and the OECD concerning tax policy developments and providing specific input setting out the views of members on these matters;

- Representing CFE Tax Advisers Europe at multiple taxation expert groups, including:
 - EU Platform for Tax Good Governance;
 - EU VAT Expert Group;
 - EU VAT Forum;
 - UN Committee of Experts in International Cooperation in Tax Matters.

Priorities

In 2019 the Fiscal Committee represented the views of members by engaging with the European Commission and OECD on relevant policy initiatives and matters of importance to the Committee, participated in various international expert groups, and issued publications and Opinion Statements.

Priorities of the Fiscal Committee in 2019 included:

Taxation of the Digital Economy

In February 2019 the OECD published a document outlining

proposals agreed by the members of the Inclusive Framework on review of the international tax rules arising from the tax challenges of the digitalising economy. The document sets out a two-pillar approach for concurrent review of the nexus and profit allocation rules as well as other policy solutions to address the 'tax rate' arbitrage and the remaining BEPS challenges.

CFE responded by publishing an Opinion Statement strongly supporting the aim of a future-proof, longer-term reform of the international tax system to address the tax challenges of the digitalisation of the economy.

In October and in December 2019, the OECD Secretariat published proposals under Pillar 1 and Pillar 2 concerning its work to advance international negotiations to ensure large and highly profitable Multinational Enterprises, including digital companies, pay tax wherever they have significant consumer-facing activities and generate their profits. CFE has published two Opinion Statements setting out Member's views regarding the OECD Pillar One and Pillar Two proposals.

Monitoring and informing our members on the progress of the

EU proposals, further OECD developments and reviewing unilateral measures introducing national digital taxes were priorities for 2019 and will remain priorities in 2020.

The EU Commission's Qualified Majority Voting Roadmap

In January 2019, the European Commission published a communication which set out a 4-step plan as to how decision making on tax matters could be modified to take place by way of qualified majority voting, by utilising the Passerelle clauses contained in Article 48(7) and Article 192(2) of the Treaty on European Union, which allows the Council to change decision making from unanimity to qualified majority voting, whereby legislative proposals can become EU law if supported by a minimum number of EU countries, representing a minimum share of the EU population.

In its communication, the Commission stated that unanimity in tax decision making has hampered progress on important tax initiatives, needed to strengthen the Single Market and boost EU competitiveness, and identified the "cost" of non-action in EU Tax Policy as the failure to progress the VAT definitive regime, CCTB & CCCTB, the financial transactions tax and the digital services tax proposals.

At ECOFIN meetings in 2019, ministers called for keeping the current balance of voting rules in taxation, noting the considerable work achieved to date in EU tax legislative files under current rules. However, the issue has been flagged as a priority to progress for the incoming Commission. The Fiscal Committee will continue to monitor developments concerning this matter.

Monitoring ATAD Implementation

In 2016 the EU Commission first presented its proposal for an Anti-Tax Avoidance Directive as part of the Anti-Tax Avoidance Package. The provisions of the EU Anti-Tax Avoidance Directive (ATAD) eventually became applicable on 1 January 2019, which was the implementation deadline for national transposition legislation. The Directive contains five legally binding anti-abuse measures, which all Member States should apply against common forms of aggressive tax planning. The anti-abuse measures, apart from hybrid mismatches, include: CFC rules, switchover rules, exit tax rules, as well as GAAR and interest limitation rules.

In 2019, the Fiscal Committee produced a questionnaire on the Anti-Tax Avoidance Directives in order to collect information concerning the implementation of the directive in Member States. The Fiscal Committee intends to draft a further Opinion Statement on the questionnaire results.

EU Tax Dispute Resolution Directive Enters Into Force

The Council Directive on tax dispute resolution mechanisms in the European Union entered into force on 1 July 2019. It will apply to complaints submitted from 1 July 2019 onwards on disputes relating to income or capital concerning the tax year commencing on or after 1 January 2018. The Directive will significantly improve the tax dispute resolution process; alleviate instances of double taxation and provide for a binding dispute resolution process with improved tax certainty for taxpayers. CFE has welcomed the developments with this Directive, and the topic was the subject of not only the Fiscal Committee's 2019



Brodie McIntosh and Stella Raventós-Calvo



Fiscal Committee meeting in Brussels

Forum, but also a significant focus in technical meetings in 2019. The Fiscal Committee will continue to monitor the issue, and publish a statement highlighting the elements of the Directive that merit further consideration, for the benefit of taxpayers and efficiency of the process.

EU Parliament – TAX3 & EU "Blacklist"

The European Parliament's Special Committee on financial crimes, tax evasion and tax avoidance (TAX3) was set up in March 2018, and in 2019 the Fiscal Committee monitored and updated delegates concerning the work carried out by the new inquiry committee.

TAX3 focused on tax avoidance and evasion related to the digital economy, circumvention of VAT, methods used in the EU tax blacklist of third-country tax havens, EU progress in removing harmful tax regimes, and the impact of double tax treaties. TAX3's report on the inquiry was presented in 2019, and will be



Indirect Taxes Subcommittee meeting in Torino



Indirect Taxes Subcommittee meeting in Brussels

the subject of an Opinion Statement of the Fiscal Committee. The Fiscal Committee also continued to monitor and update members concerning the work of EU Parliament carried out by way of maintaining the so-called “blacklist” of non-cooperative jurisdictions for tax matters.

Company Law Package

In December 2018 the EU Parliament’s Legal Affairs Committee approved a draft report of amendments to the European Commission proposal on cross-border conversions, mergers and divisions, part of the so-called Company Law Package.

In 2019, political agreement was reached concerning the company law package and the package was voted through by Parliament. The directive will start applying 36 months after its entry into force and the Fiscal Committee will closely follow the developments of implementation, with the intention to produce an Opinion Statement on the topic.

VAT Action Plan Proposal Package

The indirect taxes subcommittee have continued to monitor progress on the proposals introduced by the EU in 2018 designed to implement the definitive VAT system as well as provide interim solutions for Member States for difficulties stemming from the transitional VAT system (that has been in place for more than 25 years).

The proposals included: a proposal to simplify VAT rules for SMEs, a proposal to reform VAT rates, a proposal to introduce quick fixes to address issues with the transitional VAT system, a proposal providing for enhanced administrative cooperation, a proposal providing for an interim reverse charge to be able to be applied by Member States facing endemic carousel fraud, a proposal to align VAT rules for electronic and physical publications, and a proposal setting out the technical revisions required to existing EU VAT legislation in order to effect the proposed comprehensive revision.

Significantly, the proposal setting out simplification of VAT rules for SMEs, by way of introducing new simplified measures regarding invoicing, VAT registration, accounting and returns for SMEs acting both in wholly domestic markets and also cross-border across the EU has now been agreed at Council level. Discussions between Member States at the EU Council concerning the proposed directive as regards the introduction of the detailed technical measures for the operation of the definitive VAT regime system and in relation to the Commission’s proposed Directives on reform of VAT rates are ongoing.

Analysis of the proposed legislation has been a priority of the Indirect Taxes Subcommittee in 2019 and will continue to be the focus of the Indirect Taxes Subcommittee in 2020.

Publications & Tax Technical Work of the CFE Fiscal Committee

In 2019, the Fiscal Committee of CFE Tax Advisers Europe published three Opinion Statements, one joint Statement with the Global Tax Advisers Platform (GTAP) and two joint Statements with the Professional Affairs Committee:

- **Opinion Statement FC 1/2019** CFE Response to the OECD Consultation Document: Addressing the Tax Challenges of the Digitalising Economy.
- **Opinion Statement FC 2/2019** concerning the implications of the decision of the Court of Justice of the EU in case C-132/16 *Iberdrola* on input tax deductions.
- **Opinion Statement FC3/2019** on the Commission consultation on amending Directive 2006/112/EC, as regards provisions relating to distance sales of goods and certain domestic supplies of goods;
- **Opinion Statement CFE/GTAP** on the OECD Consultation on Draft Report on Tax Morale (2019).
- **Opinion Statement CFE 1/2019** on European Tax Advisers’ Policy Priorities for the EU Mandate 2019-2024.
- **Opinion Statement CFE 2/2019** on the OECD Consultation on a Unified Approach under Pillar One.

Opinion Statement CFE 3/2019 on the OECD Consultation on a Unified Approach under Pillar Two.



Stella Raventós-Calvo, Sami Koskinen, Wim Gohres and Aleksandar Ivanovski



Ian Young, Wim Gohres, Heather Brehcist and Alistair Cliff



Professional Affairs Committee meeting in Brussels



Professional Affairs Committee meeting in Torino

Professional Affairs Committee

Overview

The Professional Affairs Committee engages in the policy areas that concern and affect the exercise of the tax advisory profession. By way of submitting technical submissions and engaging with the European Commission and the OECD, the Professional Affairs Committee advances the CFE Board priorities that concern the tax advisory profession at large.

Apart from partaking in ongoing discussions with the EU Commission in different policy areas, the Professional Affairs Committee regularly responds to various EU and OECD questionnaires and also drafts technical updates of relevance for tax advisers which are aimed at informing the members of recent developments. In the past year, the Professional Affairs Committee has participated in various initiatives at EU and OECD level that aim to contribute to the ongoing policy debate and to voice the concerns of European tax advisers. The work of the Professional Affairs Committee broadly covers issues such as: ethics and professional codes, anti-money laundering, reporting of tax avoidance schemes, cooperation with tax authorities, digitalisation of tax services, taxpayers' rights, tax certainty, professional qualifications and regulation, liability and insurance, cross-border

mobility, business structures of tax firms, client confidentiality and legal privilege.

Activities

Following the work of the European Commission and the OECD in more detail, the Professional Affairs Committee contributed to the ongoing policy discussion of relevance for tax advisers with tax technical comments in the form of opinion statements and policy submissions to the European Commission and the OECD, as well as through ongoing participation in meetings and activities of the European Commission, European Parliament and the OECD.

In 2019, the Professional Affairs Committee published the following Opinion Statements:

- **Opinion Statement PAC 1/2019** on the European Commission Draft Supranational Risk Assessment Report for Anti-Money Laundering Risks to Services Provided by Tax Advisers.
- **Opinion Statement CFE/GTAP** on the OECD Consultation on Draft Report on Tax Morale (2019).
- **Opinion Statement CFE 1/2019** on the Opinion Statement on European Tax Advisers' Policy Priorities for the EU Mandate 2019-2024.

- **Professional Affairs Committee Questionnaire** on the project Taxpayers' Rights and Charters.

Priorities

Anti-Money Laundering

The evolution of the EU anti-money laundering legislation is an ongoing priority for the Professional Affairs Committee. In 2019 CFE published an Opinion Statement on the EU Supranational Risk Assessment report concerning tax advisers, which is a response to the EU developments since the publication of the EU Commission SNRA for tax advisers. The draft SNRA, published in January 2019 suggested a high-risk environment for tax advisers and vulnerability to AML/TF. The CFE participated in a collaborative consultation with other relevant stakeholders on the effectiveness of the EU AML Directives, and during the consultation asked the EU Commission to consider why the risk for tax advisers has not been reduced compared to the initial risk assessments, despite legislative measures introduced over the years.

Additionally, the focus of the Professional Affairs Conference for 2019 was the new EU anti-money laundering rules that were introduced by the 5th Anti-Money Laundering Directive ("AML"), which Member States are obliged to transpose into national law by 10 January 2020. The Directive is based on FATF Recommendations and builds on other EU transparency initiatives to prevent money laundering. The AML Directive covers a variety of industries including tax advisory services and thus supports the OECD efforts in fighting money laundering by the Forum on Tax & Crime.

The conference examined the perceived risks posed by the tax profession in facilitating money laundering based on the EU Commission's Supranational Risk Assessments, compliance with the new and existing EU Anti-Money Laundering Directives and efforts taken to address money laundering in the broader international context and the effect this has on tax evasion.

Taxpayers Rights and Obligations (Model Taxpayers' Charter)

In 2019, the CFE Professional Affairs Committee, together with the Global Tax Advisers Platform (GTAP), initiated a project on Taxpayers' Rights, led by Ian Young, former Direct Taxes Subcommittee Chair. CFE carried out a survey in order to find out some basic information about the way in which taxpayer rights and obligations are dealt with in CFE Member countries and how those countries deal with complaints about the way the tax system operates and affects the individual taxpayer.

The aim is to extend this survey to a global level, in collaboration with AOTCA, STEP and WAUTI, founding members of the GTAP. The Fifth International Taxpayer Rights conference will take place in May 2020 and by then CFE will have the results of the full CFE survey to showcase to attendees. CFE also published an Opinion Statement on the OECD Consultation on Draft Report on Tax Morale, where CFE stressed the importance of an equitable relationship between taxpayers and governments.

Mandatory Disclosure Rules

The Council Directive on mandatory automatic exchange of



CFE Professional Affairs Conference 2019 in Paris

information in the field of taxation in relation to reportable cross-border arrangements ("DAC6") entered into force on 25 June 2018, introducing complex mandatory disclosure rules for intermediaries across the EU. Member States had until 31 December 2019 to implement the Directive into domestic legislation, and disclosure requirements will apply to intermediaries from 1 July 2020. Given that all arrangements initiated after 25 June 2018 that fall within the scope of the Directive are reportable, there have been increased calls for the Commission to issue technical guidance to provide more clarity for tax advisers in the course of transposition of the directive.

The file was a priority for the Committee in 2019 and, to that end, CFE, together with the European Contact Group (ECG) and the European Group of International Accounting Networks and Associations (EGIAN), sent a joint letter addressed to the Director General of the European Commission, DG TAXUD, Stephen Quest, and members of Working Party IV. The letter encouraged the Commission and the Member States to continue their efforts to provide more guidance and clarification in the process of implementing DAC6 and welcomed the opportunity to actively contribute during consultations and meetings.

The Committee will conduct a survey concerning the implementation and practical reporting requirements of implementing legislation in 2020.

European Parliament Inquiries into Tax Evasion, Tax Avoidance and Financial Crimes

In 2019 the European Parliament presented the final report of the Special Committee "TAX3", initially formed in 2018, presenting the recommendations of the Committee following ten months of hearings concerning anti-money laundering and aggressive tax planning.

CFE was regularly in attendance at the parliamentary hearings and updated the Professional Affairs Committee concerning ongoing relevant developments in Parliament. The Professional Affairs Committee will monitor the uptake of any recommenda-

tions arising from the inquiries, and will follow ongoing developments in the European Parliament, in particular concerning the formation of any permanent tax inquiry committee.

Whistleblowers' Protection at EU

In 2019 the EU Council formally adopted new rules on whistle-blower protection across a wide range of sectors including public procurement, financial services, money laundering, product and transport safety, nuclear safety, public health, consumer and data protection.

The new rules will require the creation of safe channels for reporting both within an organisation - private or public - and to public authorities and Member States will have two years to transpose the new rules into their national law. The Professional Affairs Committee will monitor the implementation of the Directive in 2020.

Tax Technology Committee

Overview

The Tax Technology Committee (TTC) was established as a response to the manifest importance of digital taxation and technology and its applications in taxation both now and for the foreseeable future. In this regard, the TTC has a different approach to tax and technology, being devoted to digital transformation and all its ramifications for tax.

It is focused on the role professionals handling tax in all manifestations will have and the risks posed to them by the development of Artificial Intelligence and the direct interaction between taxpayer and revenue authorities.

Activities

With its activities initiated in January 2019, the Tax Technology Committee had three face-to-face meetings and three online meetings in 2019. The Tax Technology Committee has particular interest in the impact of digital systems on taxpayer rights and the role tax advisers will play in the process of digitalisation.

Priorities

Blockchain

Blockchain and cryptocurrency are known to be used for criminal purposes and money laundering, and this is a major problem for revenue authorities. The Tax Technology Committee focuses on the software developments that derive from Blockchain and how the software can be used for legitimate tax administration purposes.

Blockchain has the potential to become the best solution for the VAT gap issue as it enables the revenue to track money transactions. The Committee will closely follow developments in the area and report to delegates.

A paper on Blockchain and VAT is being drafted by the committee and will be published in 2020.

Taxpayer Rights in the Context of Digitalisation

With the advent of the digital economy, the necessity of a code preserving taxpayers' rights in a digital environment is apparent.



Address by Sami Koskinen, Fiscal Counsellor at the Permanent Representation of Finland to the EU & Presidency of the EU



Inaugural Tax Technology Committee meeting in Brussels

The issues of cross border exchange of information, data analysis by tax authorities and tax certainty in a digital world are crucial points to be debated by tax advisers.

To that end, the Tax Technology Committee will work jointly with the Professional Affairs Committee on the taxpayers' rights project, and on a code preserving taxpayers' rights in a digital environment.

Digital Security

Digital security is a key issue discussed by the Committee, especially regarding cross border transactions. The topic is very important for tax advisers with their work with financial information and supervising financial transactions.

In 2020, the Committee will continue to discuss digital security and security strategy.

Digitalisation of Tax Administrations

As more tax administrations go digital, countries are implementing new data submission and electronic auditing requirements,



Tax Technology Committee meeting in Torino



New Tax Professionals Committee meeting in Brussels

creating new sets of challenges for tax advisers. In 2020, the Tax Technology Committee will continue to monitor the developments on the digitalisation of tax administrations and report to its members.

NEW TAX PROFESSIONALS AD HOC COMMITTEE

The New Tax Professionals (NTP) Ad Hoc Committee was formally established during the CFE General Assembly held in Torino on 4 October 2019. The NTP Ad Hoc Committee was formed to represent new tax professionals from within CFE Tax Advisers Europe, allowing them to better understand how different Member Organisations work, promote relevant issues in their jurisdictions and build a cross-border network of the future generation of tax leaders.

The NTP Ad Hoc Committee will enable the representation of the views of newer members to the CFE, as well as facilitate the sharing of knowledge, information and experience between del-

egates within the CFE and the NTP. The NTP shall, in part, help provide potential future delegates and committee members for the CFE and Member Organisations, through helping to increase understanding of the CFE, and increasing the visibility of future leaders to those who are currently part of the CFE leadership.

The NTP will focus discussions on social mobility and D&I (Diversity & Inclusiveness); cross-border mobility; differences and similarities among tax systems; tax, ethics and morality. The Committee considers new tax professionals someone within their first 10-15 years of practice (or 10-15 years of membership of the Member Organisation).

ECJ Task Force

The CFE ECJ Task Force is a group of tax academics and renowned tax practitioners which meets regularly to discuss and issue opinion statements on selected decisions of the Court of Justice of the European Union. Since 2013, it has been chaired by Georg Kofler (CFE Tax Advisers Europe, Austria) and its current members are Alfredo Garcia Prats (Spain), Werner Haslechner (Luxembourg), Volker Heydt (EU, Belgium), Eric Kemmeren (The Netherlands), Michael Lang (Austria), Jürgen Lüdicke (Germany), João Félix Pinto Nogueira (IBFD, Portugal), Pasquale Pistone (IBFD, Italy), Emmanuel Raingard de la Blétière (France), Stella Raventós-Calvo (CFE Tax Advisers Europe, Spain), Isabelle Richelle (CFE Tax Advisers Europe, Belgium), Alexander Rust (Austria, Germany) and Rupert Shiers (CFE Tax Advisers Europe, UK).

The ECJ Task Force generally meets four times a year for full-day meetings. It aims at analysing Court decisions with wide impact and providing high-level practical input to tax practitioners on selected judgments by the Court of Justice of the European Union through its Opinion Statements. In 2019, the following Opinion Statements (ECJ-TF) were issued:

- **Opinion Statement ECJ-TF 1/2019** on the CJEU decision of 31 May 2018 in Case C-382/16, *Hornbach-Baumarkt*, concerning the application of transfer pricing rules to transactions between resident and non-resident associated enterprises (= ET 2019, 446-452).
- **Opinion Statement ECJ-TF 2/2019** on the CJEU decisions of 26 February 2019 in Cases C-115/16, C-118/16, C-119/16 and C-299/16, *N Luxembourg I et al*, and Cases C-116/16 and C-117/17, *T Danmark et al*, concerning the “beneficial ownership” requirement and the anti-abuse principle in the company tax directives (= ET 2019 [in print]).
- **Opinion Statement ECJ-TF 3/2019** on the CJEU decision of 22 November 2018 in Case C-575/17, *Sofina* and others, on withholding taxes, losses and territoriality (= ET 2020 [in print]).
- **Opinion Statement ECJ-TF 4/2019** on the CJEU decision of 26 February 2019 in Case C-135/17, *X-GmbH*, on the German CFC rules and third countries.

These Opinion Statements are submitted directly to the European Institutions, disseminated to a wide audience of tax practitioners and academics throughout Europe and published in IBFD’s “European Taxation” journal.

Moreover, the ECJ Task Force have been invited to prepare the EU Report on Subject 1 ("Reconstructing the Treaty Network") for the 2020 IFA conference in Cancun within the framework of the ECJ Task Force. Before that, the EU Report on Subject 1 ("Seeking anti-avoidance measures of general nature and scope – GAAR and other rules") for the 2018 IFA conference in Seoul was prepared within the framework of the ECJ Task Force and published in CDFI Vol. 103a (2018), pp. 61-93.

The ECJ Task Force and its members are also actively involved in the organisation of and as speakers at an annual conference at the University of Luxembourg. Topics over the last years have been "Landmark Decisions in Direct Tax Jurisprudence" (2014), "Primary Law Limits to Direct Taxation: Fundamental Rights, Fundamental Freedoms and State Aid" (2015), "EU Tax Policy in the 21st Century" (2016), "Time and Tax" (2017); "Tax and the Digital Economy" (2018); and "The Anti-Tax Avoidance Directive" (2019). Next year's conference will likely deal with dispute resolution in the area of taxation. The books containing the written contributions for the conferences are edited by Task Force Members Werner Haslehner, Georg Kofler and Alexander Rust together with Aikaterini Pantazatou (University of Luxembourg).

CFE Engagement

European Commission Platform for Tax Good Governance

The European Commission Platform for Tax Good Governance is a forum for expert representatives from business, tax professional and civil society organisations. The Platform is chaired by Director-General of DG Taxation and Customs Union, Stephen Quest. The Platform aims to facilitate a structured dialogue and exchange of views and expertise in order to achieve a more coordinated and effective EU approach to counter tax evasion and avoidance, to identify and remedy double taxation and to promote good tax systems in third countries.

CFE President, Piergiorgio Valente, and Chair of the Fiscal Committee, Stella Raventós-Calvo, participated as representatives of the CFE in 2019 at the Platform. The topics discussed in 2019 were technology and taxation, taxation of labour, environmental taxes, future proofing the EU taxation system & EU tax policy, co-operative compliance and tax competitiveness and competition.

EU VAT Forum

The EU VAT Forum offers a discussion platform where business and VAT authorities meet to discuss how the implementation of VAT legislation can be improved in practice. The CFE representatives for 2019 were Aleksandra Heinzer and Christian Amand. Issues examined in the course of the 2019 meetings included cross-border rulings, penalties and sanctions.

VAT Expert Group

The VAT Expert Group assists and advises the European Commission on VAT matters. The group is composed of individuals appointed in a personal capacity with requisite expertise in the area of VAT, and organisations representing particular businesses and tax practitioners that can assist in the development



Bert Zuijndorp, Piergiorgio Valente, Pascal Saint-Amans and Ian Hayes



Piergiorgio Valente and Aleksandra Heinzer

and implementation of VAT policies. The Chair and Vice Chair of the CFE Indirect Taxes Subcommittee, Jeremy Woolf and Trudy Perié, have recently been reappointed the CFE Tax Advisers Europe representatives to the group.

The focus of the VAT Expert Group in 2019 was on examining the "quick fixes" that come into force on 1 January 2020 and the proposals directed at imports of less than €150 that come into force on 1 January 2021. The CFE provided feedback to the Commission on the proposals by way of input at these meetings, as well as by elaborating on identified issues in its Opinion Statements and written representations to the Commission.

United Nations Tax Committee

The UN Committee of Experts in International Cooperation in Tax Matters (UN Tax Committee) now meets twice a year, in April in New York and in October in Geneva.



Roberta Grappiolo, Aleksandar Ivanovski and Wim Gohres



Wolfgang Mederer, Roberta Grappiolo and Eleftheria Psaraki

CFE applied for, and was granted, NGO (non-governmental organisation) status with the UN in 2006, and from 2006 until 2018 Ian Young, the then Chair of the CFE Direct Taxes Sub-Committee, represented CFE at the meetings of the UN Tax Committee. These meetings were originally held once per year but increased to twice per year from 2017 to reflect the increased importance of tax matters within the UN as determined at the Addis Ababa Finance For Development Conference in 2015.

In 2019 the Chair of the CFE Direct Tax Sub-Committee, Jos Goubert, took part in the two meetings of the UN Committee – one at the end of April in New York and one in mid-October in Geneva. When in 2018 a new UN Committee of Tax Experts took office, the work of the committee needed some time to restart and to reorganise the different subcommittees. In addition to the two annual, plenary, sessions of the UN Tax Committee, several sub-committees meet on an ongoing ad-hoc basis, which include the members of the Committee as well as, in some cases, repre-

sentatives of the private sector. During the plenary sessions the work of the subcommittees is discussed.

The following issues were on the agenda of the 18th and 19th Sessions of the Committee.

- Issues related to the next update of the United Nations Model Double Taxation Convention – with specific attention to the taxation of capital gains on offshore indirect transfers;
- The new handbook on mutual agreement procedure – dispute avoidance and resolution;
- The next update for the Transfer Pricing Manual;
- The Extractive Industries Handbook; and
- The Manual for the Negotiation of Bilateral Tax Treaties.

The agenda also included treatment of collective investment vehicles, taxation of development projects, environmental tax issues (with specific attention for carbon taxation), and the tax consequences of the digitalised economy.

Ian Young continues to have a peripheral role in the UN Tax Committee through the involvement of the International Chamber of Commerce (ICC) in the Tax Charter and Taxpayer Rights work that CFE is carrying out under the title “Tax Charters without Borders”. ICC, and Ian Young, have made several presentations to UN Tax Committee delegates on this work.

EU Institutions

European Commission

In 2019, CFE held regular meetings with representatives from the European Commission to exchange views and discuss policy and other technical aspects related to the policy priorities of CFE Tax Advisers Europe. Representatives of the European Commission also attended CFE events in 2019. Wolfgang Mederer, Head of Unit, Legal Affairs - Direct Tax Directorate, TAXUD; Eleftheria Psaraki, Legal Affairs - Indirect Tax Directorate, TAXUD; and Roberta Grappiolo, Head of Sector for Infringement Procedures in Direct Taxation and State aid - Direct Tax Directorate, TAXUD all addressed the January 2019 Technical Committee Meetings in Brussels, speaking on the EU Commission Roadmap on Moving to Qualified Majority Voting in Tax Matters.

Hélène Michard, Unit for Tax Administration and Fight Against Tax Fraud, DG TAXUD; Ioanna Mitroyanni, Head of Sector Corporate Tax Transparency, DG TAXUD; and Dr Max Lienemeyer, Head of Unit Tax Planning Practices, DG COMP were speakers at the CFE Forum in June 2019. Bert Zuijndorp, Head of Unit for Company Taxation Initiatives, DG TAXUD addressed the CFE General Assembly 2019 in Torino.

CFE Tax Advisers Europe was consulted in 2019 by the Commission's Taxation and Customs Union Directorate-General to provide input on their study on aggressive tax planning and harmful tax practices. On 26 June, Aleksandar Ivanovski, CFE Tax Policy Manager, and Brodie McIntosh, CFE Tax Technical Officer met with DG TAXUD representatives to provide responses on the effectiveness of EU measures related to tax planning and harmful tax practices.

Significantly, Valère Moutarlier, Director, Direct Taxation Tax Coordination, Economic Analysis and Evaluation, DG TAXUD, kindly wrote the Foreword to the CFE 60th Anniversary Book, released at the occasion of the CFE General Assembly in Turin on 4 October, reflecting on the next steps for EU tax policy within the framework of the new EU Commission presidency.

In 2019 CFE Tax Advisers Europe maintained a constructive working relationship with the European Commission.

European Parliament

Regular meetings and contact with Members of the European Parliament and their advisors was maintained in 2019. In May 2019, CFE Tax Advisers Europe concluded a Memorandum of Understanding with the European Parliament on a strategic partnership in the context of the EU elections and beyond.

Further, CFE Tax Advisers Europe celebrated its 60th Anniversary under the high patronage of the European Parliament, with a series of events, including a General Assembly, the inaugural Global Tax Advisers Platform conference and technical committee meetings held over three days in Torino, Italy, on 3 and 4 October 2019, hosted by the Italian member organisations of CFE - Associazione Nazionale Tributaristi Italiani (ANTI) & Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC).

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, David Sassoli, said:

"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.

As you are aware, the power to tax is in the hands of the Member States, with the European Union having only limited competences. However, as EU tax policy is geared towards the smooth running of the single market, the harmonisation of indirect taxation, and the 'fight against harmful tax evasion and tax avoidance, have become EU policy priorities. In this framework, and in the context of other policies, the consultation and the exchange of information on national tax laws and practices, and on the coordination and development of tax law in Europe between national tax advisers, and between national tax advisers and the European institutions, are both necessary and extremely useful.

For that reason, the institution I have the honour to preside over greatly appreciates the professional and committed work of your organisation. It also highly values your activity as an important partner in the last European elections campaign.

It is therefore with great pleasure that I grant your event the European Parliament's patronage."



Valère Moutarlier and Piergiorgio Valente



Piergiorgio Valente speaking at the Global Tax Policy Conference (Irish Tax Institute & Harvard Kennedy School Ash Centre)

Global Tax Advisers Platform

CFE Tax Advisers Europe is a founding member of the Global Tax Advisers Platform ("GTAP"), formed in 2013. GTAP is an international platform, representing more than 600,000 tax advisers in Europe, Asia and Africa, that seeks to bring together national and international organisations of tax professionals from all around the world.

GTAP is dedicated to the promotion of the public interest by ensuring the fair and efficient operation of national and international tax systems. A fair and efficient global tax framework favours the effective pursuit of taxpayers' and tax advisers' rights and interests. GTAP is committed to their furtherance, and to the continuous improvement of this framework.

In 2019, GTAP held its first Global Conference, held in Torino, Italy, on Thursday 3 October 2019 on the topic of "Tax and the Future". The conference was intended to reinforce closer cooperation by bringing to the forefront issues that are of interest to all tax advisers in a borderless, increasingly globalising and automated society, such as the future of global tax policy, the future of Corporate Income Tax and VAT, the future of the global tax profession and the future of business models and tax sustainability.

The founding members of GTAP are CFE Tax Advisers Europe, the Asia-Oceania Tax Consultants' Association (AOTCA), and the



Members and Observers of the Global Tax Advisers Platform (GTAP) in Torino



Global Tax Advisers Platform (GTAP) meeting in Torino



Global Tax Advisers Platform (GTAP) meeting at the margins of the 17th AOTCA International Tax Conference in Busan



Global Tax Advisers Platform (GTAP) meeting in Brussels

West Africa Union of Tax Institutes (WAUTI), and the observer members are the International Association of Financial Executives Institutes (IAFEI), the Society of Trust and Estate Practitioners (STEP), and the Arc Méditerranéen des Auditeurs (AMA). It is a key priority for GTAP to expand its membership and international network in order to reach tax professionals in all corners of the globe, effectively enabling the most inclusive dialogue and interaction.

On that basis, the GTAP members and observers signed the Torino-Busan Declaration in 2019. In this document, GTAP sets out four key short-term priorities to pursue 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. The declaration was signed on 3 October 2019 on the occasion of the first GTAP Global Conference, and on 17 October 2019 in Busan, South Korea, on the occasion of the 2019 International Tax Conference of AOTCA.

Knowledge Sharing

CFE Academy

The CFE Academy aims to share knowledge and experience on tax matters while exchanging ideas on practical tax issues.

The Academy creates opportunities for tax professionals to be updated on global tax developments through attending seminars and trainings.

In 2019, a CFE Academy seminar took place on 11 October 2019 in Mongolia, in partnership with the Mongolian Association of Certified Tax Consultants.

In addition, this year, CFE Tax Advisers Europe and the Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC) signed a Memorandum of Understanding under which Italian accountants and tax advisers can participate in online courses on topics concerning European and international taxation. The first course was successfully recorded in July 2019 in Milan, Italy, on the topic of International and EU Taxation and Tax Policy. The lectures were provided by academic speakers and practitioners associated with CFE.

The second, third and fourth courses will be recorded in the coming months, and the topics of the courses will be Comparative Tax Policy Developments and Reflections on Ancillary Taxation Issues, International Tax Policy and EU Tax Law and Tax Policy, respectively.

The E-Learning platform is available in Italy to CNDCEC members, and it will soon be made available for practitioners worldwide through CFE Tax Advisers Europe.



The CFE Annual Tax Dinner with representatives from the European Institutions in attendance is held in Brussels.



CFE Tax Advisers Europe attends the OECD Consultation on the Taxation Challenges of the Digital Economy in Paris, France.



CFE President Piergiorgio Valente speaks on a global approach to the digitalisation of the economy at the Global Tax Policy Conference in Dublin, Ireland.

JANUARY

FEBRUARY

MARCH

APRIL

MAY

JUNE

JULY

CFE publishes an Opinion Statement on the European Commission Draft Supranational Risk Assessment Report for Anti-Money Laundering Risks to Services Provided by Tax Advisers.



Wim Gohres, Chair of the CFE Professional Affairs Committee, speaks on Mandatory Disclosure Rules at the General Assembly of the Association of Finnish Tax Professionals in Helsinki, Finland.



The CFE Tax Advisers Europe Forum is held in Brussels, Belgium, on the topic of “Creating Tax Certainty in an Uncertain World: Double Taxation, Tax Rulings & Dispute Resolution Processes”.





CFE Academy completes the 1st edition of the E-Learning Courses in cooperation with CNDCEC.



In order to celebrate its 60th Anniversary, CFE publishes the Liber Amicorum (IBFD).



The 12th European Conference on Tax Advisers' Professional Affairs is held in Paris, France, on the topic of "Making Anti-Money Laundering More Effective For Tax Advisers."

AUGUST

SEPTEMBER

OCTOBER

NOVEMBER

DECEMBER

CFE finalises the publication of the 60th Anniversary Book.



The inaugural Global Tax Advisers Platform (GTAP) Conference is held in Torino, Italy, on the topic of "Tax and the Future."



Under the high patronage of the European Parliament, the 60th Anniversary CFE General Assembly takes place in Torino, Italy.





Piergiorgio Valente opening the CFE Forum 2019 in Brussels

CFE Tax Advisers Europe Forum 2019 - Creating Tax Certainty in an Uncertain World: Double Taxation, Tax Rulings & Dispute Resolution Processes

The CFE Tax Advisers Europe Forum was held in Brussels, Belgium, on Thursday 6 June 2019, on the topic of “Creating Tax Certainty in an Uncertain World: Double Taxation, Tax Rulings & Dispute Resolution Processes”. The Forum examined existing MAP mechanisms and the EU Tax Dispute Resolution Mechanisms Directive. The Forum further discussed means of avoiding tax disputes, such as indirect and cross-border rulings, as well as the State aid challenges to direct tax rulings- confirmatory rulings and advance pricing agreements (APAs).

Discussions were split across four panels and considered questions such as OECD and EU tax dispute resolution mechanisms, their efficiency and whether they improve tax certainty; the impact of dispute resolution processes on taxpayers, and their rights and obligations; means of avoiding tax disputes, such as cross-border rulings, and their efficacy; whether a European tax court or international tax administration ought to be established; and whether the European Commission should issue guidance on the State aid

proofing of tax rulings given the uncertainty arising from State aid inquiries (confirmatory rulings and APAs).

Suzanne Metzler, Deputy Director at the Permanent Representation of the State of North Rhine-Westphalia to the EU welcomed speakers and attendees to the Forum, followed by an introduction of the topics for the panels by Piergiorgio Valente, President of CFE Tax Advisers Europe.

Panel I

The first panel entitled “Avoiding Tax Disputes - Indirect Tax Cross-Border Rulings Scheme & Co-Operative Compliance Systems” discussed current means of avoiding disputes, in particular the indirect tax EU pilot ruling scheme, VAT Cross-Border Rulings, “CBR”, and panellists shared experiences of the scheme in practice. In addition, the panellists examined other means by which tax administrations and advisers can work collaboratively to anticipate and resolve disputes before they actually occur, such as confirmatory tax rulings and classification of taxpayer risk by tax administrations.

Hélène Michard, Unit for Tax Administration and Fight Against Tax Fraud, DG TAXUD, European Commission, discussed the mandate of the EU VAT Forum, its subgroups and activities; VAT Cross-Border Rulings; and the feedback received by the Commission

concerning the CBR scheme. She also spoke about the role of CBR in preventing possible VAT disputes.

François Coutureau and Jean-Claude Mbonyumutwa Semucyo from the Ministry of Finance of Belgium discussed cross border rulings from the perspective of the Belgian Ministry of Finance and the means of avoiding double taxation when applying VAT rules. They also shared the Belgian view on confirmatory tax rulings and means of co-operation with taxpayers.

Emmanuel Cotessat, International VAT Association, and Matteo Dellapina from Studio P. Centore & Associates discussed their experience of the CBR scheme from the practitioner perspective, sharing their views on possible alternative methods for avoiding disputes and the EU pilot ruling scheme. The panel was moderated by Jeremy Woolf, Chair of the CFE Indirect Taxes Subcommittee.

Panel II

The second panel entitled “Cross-Border Tax Dispute Resolution – OECD BEPS Action 14 & Mutual Agreement Procedure”, moderated by Stella Raventós-Calvo, Chair of the CFE Fiscal Committee, examined OECD co-operative compliance under Action 14 of the BEPS Action Plan and Mutual Agreement Procedure dispute resolution mechanisms, the policy origins of the mechanisms, their

application and efficiency in practice, and whether they improve tax certainty. The panel also considered the impact of the processes on taxpayer rights and obligations and whether a European or international tax (arbitration) court is required in the light of the complicated nature of cross-border tax disputes.

Sandra Knaepen, Head of the Mutual Agreement Procedure Unit, Centre for Tax Policy and Administration, OECD, presented the technical aspects of the OECD’s co-operative compliance under Action 14 of the BEPS Action Plan and Mutual Agreement Procedure dispute resolution mechanisms, as well as the policy origins of the mechanisms and the efficiency in practice. Hans Mooij, Chair of TRIBUTE, Foundation for International Tax Dispute Resolution, discussed his views on the OECD’s MAP and the European Union’s Tax Dispute Resolution Mechanism Directive.

Levent Sabanogullari from the Permanent Court of Arbitration discussed the establishment and role of the Court of Arbitration in cross-border disputes and processes of arbitration and hearings and how this interacts with the OECD and EU dispute resolution processes. Peter Nias, Barrister at the Pump Court Chambers in the United Kingdom discussed a holistic approach to Dispute Resolution Management, the CDR Programme and how it completes MAP, the MAP gap, and Supplementary Dispute Resolution (SDR) mechanisms.



Peter Nias, Levent Sabanogullari, Sandra Knaepen, Stella Raventós-Calvo and Hans Mooij



Suzanne Metzler addressing the CFE Forum 2019 in Brussels



Peter Nias, Sandra Knaepen, Stella Raventós-Calvo, Hans Mooij and Levent Sabanogullari



CFE Forum 2019 in Brussels



Arno Oudijn, Ioanna Mitroyanni, Isabelle Richelle and Nicola Crispino



Matteo Dellapina, Emmanuel Cotessat, H el ene Michard, Fran ois Coutureau and Jean-Claude Mbonyumutwa Semucyo



Fran ois Coutureau and Jean-Claude Mbonyumutwa Semucyo



Isabelle Richelle, Ine Lejeune and Jeremy Woolf

Panel III

The third panel, entitled “EU Directive on Tax Dispute Resolution Mechanisms” discussed the dispute resolution process contained in the EU Tax Dispute Resolution Mechanisms Directive, the policy origins of the mechanism, its application in practice, and whether it will improve tax certainty. The panellists also considered the impact of the processes on taxpayer rights and obligations and whether a European or international tax (arbitration) court is required in the light of the complicated nature of cross-border tax disputes. Finally, the panel questioned the impact of potential further revisions of international taxation principles and corporate taxation reform contained in the EU anti-tax avoidance directives on tax certainty.

Ioanna Mitroyanni, Head of Sector Corporate Tax Transparency, DG TAXUD, European Commission; Arno Oudijn, Fiscal Counsellor at the Dutch Ministry of Finance; Nicola Crispino, R odl & Partner; and Ine Lejeune, PwC, collectively discussed the EU Directive and outlined the Commission’s proposals with a joint detailed analysis of the four stages of the dispute resolution process, namely the complaint, the MAP, the opinion of an advisory commission and the final decision.

The speakers also discussed whether the Directive is subject to

Article 47 EU Charter of Fundamental Rights and, in spite of the taxpayer not being a party to the proceedings, in what ways they could be entitled to fair trial rights per the Directive / Article 47 of the EU Charter. The panel was moderated by Prof. Dr. Isabelle Richelle, member of the ECJ Task Force, CFE Tax Advisers Europe.

Panel IV

The fourth panel entitled “Direct Tax Rulings – State Aid Challenges”, moderated by Aleksandar Ivanovski, CFE Tax Policy Manager, examined tax certainty issues related to the State Aid challenges for tax rulings and advance pricing agreements (APAs).

Dr Max Lienemeyer, Head of Unit Tax Planning Practices, DG COMP, European Commission; Ted McGrath, Tax Partner at William Fry; Nina Niejahr from Baker McKenzie; and Conor Quigley QC, Barrister at Serle Court, United Kingdom debated the robustness of EU Commission’s fiscal State aid enforcement policy in light of the recent Commission decisions / ECJ decisions as well as the need for guidance for taxpayers in light of the tax certainty debate.

Gary Ashford, CFE Vice-President made the closing remarks at the 2019 CFE Tax Advisers Europe Forum.



Max Lienemeyer, Conor Quigley QC, Aleksandar Ivanovski, Nina Niejahr and Ted McGrath



Aleksandar Ivanovski

Award of the CFE Albert J. Rädler Medal 2019



Albert Rädler, Andrew Clarke, Tom Ceulemans and Piergiorgio Valente

The CFE Albert J. Rädler Medal 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.

CFE Tax Advisers Europe awarded the Albert J. Rädler Medal 2018 for academic excellence in European taxation to Mr. Tom Ceulemans of the University of Antwerp, Belgium, for his Master's thesis titled "The Implementation of Articles 7 and 9 ATAD (EU Anti-Tax Avoidance Directive) regarding CFC rules into Belgian Corporate Income Tax Law." The Medal was awarded in Brussels by Andrew Clarke, Adviser to the Executive Board of CFE Tax Advisers Europe, at the occasion of the Forum 2019, CFE's flagship international tax conference, which took place on 6 June 2019.

Mr. Ceulemans identified potential loopholes and weaknesses in the Belgian implementation legislation and points in the final part of his thesis to specific improvement measures. Of particular interest in this context is the lack of double tax treaty relief in the new Belgian legislation, which seems to be in conflict with ATAD's requirements and also fails to meet the ECJ's proportionality test criteria. The conclusions that Mr Ceulemans reaches are relevant from a broader policy perspective, too. This thesis will add value to other EU Member States' efforts to comply with the ATAD mandate.



Hélène Michard and Jeremy Woolf



Gary Ashford



CFE Forum 2019 in Brussels

12th European Conference on Tax Advisers' Professional Affairs

The 12th European Conference on Tax Advisers' Professional Affairs, hosted by CFE Tax Advisers Europe and the Institut des Avocats Conseils Fiscaux (IACF), took place on Friday 29 November 2019; this year entitled "Making Anti-Money Laundering More Effective For Tax Advisers". Two panels of expert speakers considered the international approach against tax and financial crime as well as the risks posed by the tax profession in facilitating money laundering based on the EU Commission's Supranational Risk Assessments, compliance with the new and existing EU Anti-Money Laundering Directives and efforts taken to address money laundering in the broader international context and the effect this has on tax evasion.

With the introduction of various compliance obligations arising out of the EU anti-money laundering rules, that have been introduced by the 5th Anti-Money Laundering Directive ("AML"), panellists also discussed the issues of introduction of beneficial ownership registers and the related trends of making such registers public, as well as the existing FATF Standards and Recommendations that build on other EU transparency initiatives to prevent money laundering. As such, the panellists addressed the newly established regulatory environment as well as the background issues arising from various public revelations such as the Panama Papers, and how those affected the public industries including tax advisory services and financial institutions, and how the OECD efforts in fighting money laundering by the unit on Tax & Crime address these problems.

The Panel 1 discussion addressed the international approach against money-laundering, and was chaired by Dick Barmiento, Delegate of the CFE Professional Affairs Committee. As the keynote speaker, Nilimesh Baruah from the OECD Centre for Tax Policy and Administration presented the OECD work related to tax and crimes. Mr Baruah discussed the increasingly complex and innovative forms of tax evasion and other financial crimes as well as the intrinsic link between such crime and the use of corporate vehicles. Coinciding with the 10th Anniversary of the OECD Global Forum on Tax Transparency and Exchange of Information, Mr Baruah highlighted the indispensable role of the Global Forum in improving the transparency tools worldwide and the role of the Forum in providing governments tools to exchange data on previously opaque information, and give enforcement authorities means to address issues arising from the opacity of such structures for the benefit of their citizens. Dr Katerina Boguslavska, Project Manager of the AML Basel Index and formerly a researcher at Chatham House explained the relevance of the Basel Index, a research based ranking of countries' exposure to ML and TF risks. Dr Boguslavska also discussed the tax related risks and the relevance for tax advisers of the data and analysis contained in the publicly available Basel AML index.

In the same panel discussion, a UK perspective on the AML approach was presented by Samantha Bourton of the University of the West of England, who described the UK as one of the pioneer jurisdictions in implementing key AML international obligations, often going well beyond the minimal requirements in EU legislation. Finally, Dr Robby Houben, professor of financial law at the University of Antwerp discussed the emergence and proliferation of cryptoassets and the risks



Robby Houben, Katerina Boguslavska, Dick Barmiento, Nilimesh Baruah, Samantha Bourton



Katerina Boguslavska, Dick Barmiento and Nilimesh Baruah

for money laundering inherently contained in such new technologies largely based on distributed ledgers such as blockchain. In conclusion, Dr Houben suggested that the perceived risks need to be addressed with future-proof regulation and enforcement, rather than 'blaming' the technology itself, which should be harnessed for wider societal benefit.

The second panel examined the perceived risks posed by the tax profession in facilitating money laundering based on the EU Commission's Supranational Risk Assessments, compliance with the new and existing EU Anti-Money Laundering Directives and efforts taken to address money laundering in the broader international context and the effect this has on tax evasion. The panel discussion was chaired by Heather Brehcist, Head of Professional Standards at the Chartered Institute of Taxation (UK) and Delegate of the CFE Professional Affairs Committee.

Panellists considered the effectiveness and the impact of existing EU rules and the new requirements of the 5th AML Directive, including making beneficial owners of legal entities registers public and providing increased access to information on the beneficial ownership. Speakers also discussed the impact of enhanced cooperation and exchanges of information provided for between the EU and Member States under the 5th AML Directive. In addition, panellists discussed compliance with and implementation of the measures by tax advisers in practice and the information available to supervisory bodies to facilitate their obligations under the Directive.

Wim Gohres, Chair of the CFE Professional Affairs Committee and



Wim Gohres, John Binns, Heather Brehcist, Christian Leroy and Gary Ashford



Wim Gohres opening the 12th CFE European Professional Affairs Conference in Paris



Wim Gohres, Nilimesh Baruah and Ian Hayes



CFE Professional Affairs Conference in Paris



CFE Professional Affairs Conference in Paris



Damir Brajković, Karima Baakil and Ivan Čevizović

John Binns, Partner BCL Solicitors UK, presented the AML rules in practice. Mr Gohres presented the application and administration of the AML rules in practice from the perspective of an AML compliance officer in the Netherlands. Mr Binns highlighted the risks from a UK perspective, and the challenges and opportunities arising out of the potential regulatory divergence between the EU and the UK post-Brexit. Christian Leroy, a Member of the Board of the Conseil National des Barreaux, France, compared and contrasted the differences in the implementation of the European AML regime across EU jurisdictions, primarily identifying the issue of the original intent of the AML regime to apply to the financial sector, such as banks, and subsequently being adopted to the non-financial sectors. Lastly, Gary Ashford, Vice-President of CFE Tax Advisers Europe, discussed the approach to civil treatment of tax fraud, evaluating the possibilities and risks, the client per-

spective on such issues, reputational risks and transparency issues arising out of the international legal obligations such as DAC and OECD-based instruments for exchange of information. Mr Ashford highlighted the issues related to civil investigations of tax fraud, such as contractual disclosure facilities and the negotiated financial settlement.

Mr Bruno Gouthière, Executive Board Member of CFE Tax Advisers Europe and Partner at CMS Francis Lefebvre, closed the 12th European Conference on Tax Advisers Professional Affairs, commenting on the extent to which the professional landscape for tax advisers has changed in the past years and the importance of such discussions concerning obligations for tax advisers that are not necessarily related to their daily tax advisory role, but which have a significant impact on the exercise of the tax profession.



David Russell, Euney Marie Mata-Perez, Piergiorgio Valente, Gladys Olajumoke Simplice, Gabriele Fontanesi, Federico Broglio, Mario Garavoglia

The Inaugural Global Tax Advisers Platform Conference

In 2019, the Global Tax Advisers Platform held its first Global Conference, in Torino, Italy, on Thursday 3 October 2019 on the topic of “Tax and the Future”. The conference reflected the conviction that tax advisers of all jurisdictions have common interests; and that these interests can be pursued more effectively together.

Piergiorgio Valente, President of CFE Tax Advisers Europe, welcomed speakers and attendees to the Conference, followed by an introduction from Sergio Rolando, Council Treasurer of the City of Turin; Giuseppe Zafarana, Commanding General of the Guardia di Finanza (GdF); Massimo Miani, President at the Consiglio Nazionale dei Dottori Commercialisti e Degli Esperti Contabili (CNDCEC); Gaetano Ragucci, President at the Associazione Nazionale Tributaristi Italiani (ANTI); and Volker Kaiser, Vice-President at the Bundessteuerberaterkammer (BStBK).

The first panel entitled “Future of Global Tax Policy” discussed how the future will drive tax policy issues worldwide. Krister Andersson, Vice President of the Employers’ Group, European Economic and Social Committee (EESC); Gladys Olajumoke Simplice, President of the West African Union of Tax Institutes (WAUTI); Bert Zuijndorp, European Commission; Bruno Ferroni, Professor at the Università Cattolica del Sacro Cuore; and Euney Marie J. Mata-Perez, President of Asia-Oceania Tax Consultants’ Association (AOTCA) were the speakers on the first panel, moderated by Piergiorgio Valente, President of CFE Tax Advisers Europe.

The second panel was moderated by Stella Raventós-Calvo, Chair of the CFE Fiscal Committee, and discussed the future of Corporate Income Tax and VAT. João Félix Pinto Nogueira, Deputy Academic Chairman at IBFD; Gaetano Ragucci, President of ANTI; Francesca Mariotti, Director of Tax Policies at Confindustria; and John Voyez, Partner at Smith & Williamson LLP debated how digitalisation will affect direct and indirect taxation.

On the third panel, David Russell QC, Deputy Chairman at the Society of Trust and Estate Practitioners (STEP); Nii Ayi Aryeetey, Immediate Past President of WAUT and Glyn Fullelove, President of the Chartered Institute of Taxation (CIOT), discussed the future of the global tax profession. The panel was moderated by Wim Gohres, Chair of the CFE Professional Affairs Committee.

The fourth panel was dedicated to debate the future of business models and tax sustainability. Ian Hayes, Chair of the CFE Tax Technology Committee, moderated high level discussion among Eric Herren, from the International Institute for Counter Terrorism; Massimo Getto, Vice-President and CFO at Viasat Group; Glyn Fullelove, President of the Chartered Institute of Taxation (CIOT); and Gilberto Gelosa, CNDCEC.

Gary Ashford, CFE Vice-President, gave a closing speech to the GTAP Global Conference 2019, followed by Gabriele Fontanesi, International Association of Financial Executives Institutes (IAFEI); Mario Garavoglia, President of the Center for Criminal Tax Law (CDPT); Gilberto Gelosa, CNDCEC; Luca Asvisio, President of the Ordine Dei Dottori Commercialisti e Degli Esperti Contabili di Torino (ODCEC); and Ernesto Ramojno, President of the Piemonte-Valle D’Aosta section, ANTI.



Ian Hayes, Olateju Somorin, Gladys Oluajumoke Simplice and Piergiorgio Valente



Ian Hayes, Gilberto Gelsa, Massimo Getto, Eric Herren



Mario Garavoglia, Gilberto Gelsa, Gary Ashford and Gabriele Fontanesi



João Nogueira, Stella Raventós-Calvo, John Voyez, Francesca Mariotti, Gaetano Ragucci



Inaugural Global Tax Advisers Platform (GTAP) Conference in Torino



Bruno Ferroni, Gladys Simplice, Piergiorgio Valente, Euney Marie Mata-Perez, Bert Zuijndorp and Krister Andersson



Bert Zuijndorp and Krister Andersson



The Global Tax Advisers Platform (GTAP) at the margins of the 17th AOTCA International Tax Conference in Busan



Juan López Rodríguez, Stella Raventós-Calvo and Piergiorgio Valente



Anna Misiak, Jiří Nekovář and Petra Pospíšilová



Gary Ashford and Giampiero Guarnerio

CFE Annual Tax Dinner

CFE Tax Advisers Europe organises an annual dinner which provides the opportunity to strengthen relationships with colleagues and counterparts, and expand engagement beyond formal policy meetings on technical issues. Attendees are able to exchange views in an informal setting with members of the European Commission working in relevant areas, such as Directorate-General for Taxation and Customs Union (DG Taxud), Members of the European Parliament with a particular interest in tax and Members of the Council of the European Union.

In 2019, the Annual Tax Dinner took place on Monday 28 January 2019 at the Amigo Hotel in Brussels. The following representatives of the European Institutions were among the attendees: Richard Lyal, Principal Legal Adviser, Directorate D (Direct taxation, Tax coordination, Economic analysis and Evaluation), European Commission; Momchil Sabev, Head of Unit, Directorate E (International and General Affairs), European Commission; Andreas Strub, Head of Unit, General Secretariat of the Council of the European Union; Wolfgang Mederer, Head of Unit, Directorate D (Direct taxation, Tax coordination, Economic analysis and Evaluation), European Commission; Eleftheria Psaraki, Policy Officer, Directorate C (Indirect Taxation and Tax Administration), European Commission; Juan López Rodríguez, Legal Officer, Directorate-General for Taxation and Customs Union, European Commission. Jorge Ferreras Gutiérrez, Counsellor, Permanent Representation of the Kingdom of Spain to the EU was also among the attendees.



Gilberto Gelosa and Piergiorgio Valente



Richard Lyal and Jeremy Woolf



Wolfgang Mederer, Anne Gunnell and Jos Goubert



Stella Raventós-Calvo and Wolfgang Mederer



Piergiorgio Valente and Ian Hayes



CFE Annual Tax Dinner



Aleksandra Heinzer, Marc Bornhauser and Trudy Perié



Monica Zafferani and Daniela Mina



Ian Hayes, Martin Phelan, Piergiorgio Valente and Aleksandra Heinzer



Momchil Sabev and Aleksandar Ivanovski

International Tax Cooperation Congress 2019

The International Tax Cooperation Congress 2019 was held in Barcelona, Spain, on 17 & 18 January on “Digital Economy, Transfer Pricing and Litigation in Tax Matters”. Piergiorgio Valente, CFE President, spoke on taxation of the Digital Economy, and CFE Fiscal Committee Chair Stella Raventós-Calvo moderated a panel on “International Legal Limits on Taxation of the Digital Economy”.

The General Assembly of the Association of Finnish Tax Professionals

Wim Gohres, Chair of the CFE Professional Affairs Committee, was invited to attend the General Assembly of the Association of Finnish Tax Professionals in Helsinki, Finland, on 25 April. At the meeting, Wim Gohres spoke on Mandatory Disclosure Rules.

Global Tax Policy Conference

The Irish Taxation Institute (ITI), a member organisation of CFE Tax Advisers Europe, and the Harvard Kennedy School of Governance organised ITI’s third Global Tax Policy Conference, which took place in Dublin, Ireland, on 22 – 24 May, entitled “Driving the Future”. Over two days of high-level discussions, representatives of the OECD, EU Commission, tax advisers, business and academia compared and contrasted the different proposals and possible outcomes. CFE President Piergiorgio Valente spoke on a global approach to the digitalisation of the economy.

IFA European Region Conference 2019

The IFA European Region Conference 2019 was held in Warsaw, Poland, on 22 – 24 May, entitled “Current challenges to income and VAT taxation”. The conference was attended by Anna Misiak, CFE Vice-President.

The 4th International Taxpayers Rights Conference

On 22 - 24 May Ian Young attended the 4th International Taxpayers Rights Conference in Minneapolis, United States, representing CFE. The theme of the conference was taxpayer rights in the digital age and there were panel sessions on Big Data, Whistleblowers and vulnerable taxpayers. The conference also saw the update of the IBFD Observatory of protection of taxpayer rights.

CFE Tax Advisers Europe Meeting with the Chamber of Tax Advisers of the Czech Republic and the Institut des Experts-Comptables et des Conseils Fiscaux

On 6 September 2019, CFE Tax Advisers Europe met with the Chamber of Tax Advisers of the Czech Republic and the Institut des Experts-Comptables et des Conseils Fiscaux in Brussels. At the meeting, CFE Tax Policy Manager Aleksandar Ivanovski had the opportunity to discuss the CFE’s priorities for the technical committees and strengthen relationships with CFE members.

Italia-Africa Business Week

CFE Tax Advisers Europe also participated in the Italia-Africa Business Week held on 26 – 27 November in Milan, Italy. The conference gathered more than 300 attendees to discuss business development, international cooperation and more. CFE President Piergiorgio Valente participated in a roundtable on “Customs and trade between Africa and Italy”.



Stella Raventós-Calvo at the International Tax Cooperation Congress 2019 in Barcelona



Piergiorgio Valente at the Irish Tax Institute Global Tax Policy Conference in Dublin



Christine Cloquet, Aleksandar Ivanovski and Radek Neužil



Piergiorgio Valente attending the Italia-Africa Business Week in Milan

CFE Publications

Opinion Statements – Policy and Technical Position Papers Published in 2019 by CFE Tax Advisers Europe

Fiscal Committee:

In 2019, the Fiscal Committee of CFE Tax Advisers Europe published three Opinion Statements, one joint Statement with the Global Tax Advisers Platform (GTAP) and three joint Statements with the Professional Affairs Committee:

- **Opinion Statement FC 1/2019** CFE Response to the OECD Consultation Document: Addressing the Tax Challenges of the Digitalising Economy.
- **Opinion Statement FC 2/2019** concerning the implications of the decision of the Court of Justice of the EU in case C-132/16 *Iberdrola* on input tax deductions.
- **Opinion Statement FC3/2019** on the Commission consultation on amending Directive 2006/112/EC, as regards provisions relating to distance sales of goods and certain domestic supplies of goods.
- **Opinion Statement CFE/GTAP** on the OECD Consultation on Draft Report on Tax Morale (2019).
- **Opinion Statement CFE 1/2019** on the Opinion Statement on European Tax Advisers' Policy Priorities for the EU Mandate 2019-2024.
- **Opinion Statement CFE 2/2019** on the OECD Consultation on a Unified Approach under Pillar One.
- **Opinion Statement CFE 3/2019** on the OECD Consultation on a Unified Approach under Pillar Two.

Professional Affairs Committee:

In 2019, the Professional Affairs Committee of CFE Tax Advisers Europe published one Opinion Statement, one Questionnaire, one joint Statement with the Global Tax Advisers Platform (GTAP) and three joint Statements with the Fiscal Committee:

- **Opinion Statement PAC 1/2019** on the European Commission Draft Supranational Risk Assessment Report for Anti-Money Laundering Risks to Services Provided by Tax Advisers.
- **Opinion Statement CFE/GTAP** on the OECD Consultation on Draft Report on Tax Morale (2019).
- **Opinion Statement CFE 1/2019** on the Opinion Statement on European Tax Advisers' Policy Priorities for the EU Mandate 2019-2024.
- **Opinion Statement CFE 2/2019** on the OECD Consultation on a Unified Approach under Pillar One.
- **Opinion Statement CFE 3/2019** on the OECD Consultation on a Unified Approach under Pillar Two.
- **Professional Affairs Committee Questionnaire** on the Project Taxpayer's Rights and Charters.

ECJ Task Force:

In 2019, the ECJ Task Force published four Opinion Statements:

- **Opinion Statement ECJ-TF 1/2019** on the CJEU decision of 31 May 2018 in Case C-382/16, *Hornbach-Baumarkt*, concerning the application of transfer pricing rules to transactions between resident and non-resident associ-

ated enterprises (= ET 2019, 446-452).

- **Opinion Statement ECJ-TF 2/2019** on the CJEU decisions of 26 February 2019 in Cases C-115/16, C-118/16, C-119/16 and C-299/16, *N Luxembourg I et al*, and Cases C-116/16 and C-117/17, *T Danmark et al*, concerning the “beneficial ownership” requirement and the anti-abuse principle in the company tax directives (= ET 2019 [in print]).
- **Opinion Statement ECJ-TF 3/2019** on the CJEU decision of 22 November 2018 in Case C-575/17, *Sofina and others*, on withholding taxes, losses and territoriality (= ET 2020 [in print]).
- **Opinion Statement ECJ-TF 4/2019** on the CJEU decision of 26 February 2019 in Case C-135/17, *X-GmbH*, on the German CFC rules and third countries.

External Publications

European Taxation Tax Journal

The leading European tax law journal *European Taxation*, edited by IBFD, regularly publishes articles on CFE conferences and selected Opinion Statements of particular relevance. *European Taxation* is the official journal of the CFE Tax Advisers Europe.

The following are a list of the Opinion Statements published by *European Taxation* in 2019:

- **The Ulaanbaatar Declaration: 10 Keys Priorities in International Taxation Identified by the Global Tax Advisers' Platform (GTAP)** (Piergiorgio Valente, CFE President). Published in Volume 59 – Number 1 - 2019.
- **Opinion Statement ECJ-TF 3/2018** on the CJEU decision of 12 June 2018, in Case C-650/16, *Bevola*, concerning the utilisation of “definitive losses” attributable to a foreign permanent establishment. Published in Volume 59 – Number 2/3 - 2019.
- **Opinion Statement FC 1/2019** CFE Response to the OECD Consultation Document: Addressing the Tax Challenges of the Digitalising Economy. Published in Volume 59 – Number 8 - 2019.
- **Opinion Statement ECJ-TF 1/2019** on the CJEU decision of 31 May 2018 in Case C-382/16, *Hornbach-Baumarkt*, concerning the application of transfer pricing rules to transactions between resident and non-resident associated enterprises. Published in Volume 59 – Number 9 – 2019.
- **Opinion Statement ECJ-TF 2/2019** on the CJEU decisions of 26 February 2019 in Cases C-115/16, C-118/16, C-119/16 and C-299/16, *N Luxembourg I et al*, and Cases C-116/16 and C-117/17, *T Danmark et al*, concerning the “beneficial ownership” requirement and the anti-abuse principle in the company tax directives. Published in Volume 59 – Number 10 – 2019.
- **Opinion Statement CFE 1/2019** on European Tax Advisers' Policy Priorities for the EU Mandate 2019-2024.

Interviews & Articles

In 2019, CFE President Piergiorgio Valente had an article published on *Intertax*, a periodic publication of Kluwer Law International which provides analysis on international tax law. In the article entitled “Geotaxation and the Digital: Janus in the Mirror”, the CFE President spoke about the development of the international tax scenario and how it reflects on modern geotaxation.



FOREWORD

Valère Moutarlier, Director, Direct Taxation
Tax Coordination, Economic Analysis and Evaluation, DG
TAXUD, European Commission



As we approach the end of the current Commission mandate and start to prepare for a new one, it is the ideal time to reflect on the next steps for EU tax policy. It is the moment to consider what we have achieved over the past five years and what we want to achieve in the next five, and beyond. Planning the next agenda for taxation in Europe is a process that must be carefully balanced.

On one hand, there should be minimum disruption to the work already done or to the reforms which are still being implemented. On the other hand, procrastination is not an option in today's rapidly changing world, where globalisation, digitalisation and wider social change continue to undermine the more traditional structures around taxation.

The past five years have undoubtedly been the most dynamic period ever in EU tax policy. There are a number of reasons for this. Taxation became an area of increasing public interest, largely due to the financial crisis and a series of high profile media leaks.

This in turn fuelled a new political impetus around the agenda for fair and effective taxation, with a focus on delivering real results. In addition, Member States realised that, in the modern environment, taxation can no longer be treated in isolation. Its impact on economic, social, monetary, environmental and development policies has become increasingly apparent. So too has its influence on key priorities for Europe, such as competitiveness, job creation, social justice and sustainable resources. With this in mind, Member States gradually accepted that they have to work together on taxation if they are to face up to modern challenges and achieve their collective goals.

The result has been a number of significant and much-needed reforms in Europe – and beyond – in a very short space of time. These broadly fall into three categories.

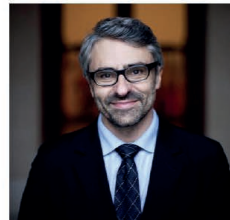
First, we have created a robust new tax transparency framework and secured an unprecedented level of openness on tax matters across the EU. Member States have agreed to much greater administrative cooperation and information sharing – on both individuals and companies.

The first two Directives on Administrative Cooperation laid the ground for automatic exchange of a wide range of information on individuals' income – from employment and pension income to financial accounts. This was reinforced in 2017, following the Panama Papers revelations, to also cover information related to money laundering. Regarding companies' income, further amendments to the Directive ensured the automatic exchange of information on tax rulings and multinationals' accounts.



OPENING REMARKS

Pascal Saint-Amans
Director of the Centre for Tax Policy
and Administration of the OECD



It is now taking on a new challenge to arrive to a consensus solution to address the tax consequences arising from the digitalisation of the economy. Changes are massive, notably for tax practitioners worldwide, as they must adapt to a new and constantly evolving environment.

The Reality of Tax Transparency in Practice

While 10 years ago, bank secrecy and opaque structures were used and abused by too many taxpayers across the world to hide their assets and income from tax administrations, bank secrecy for tax purposes no longer exists in 2019 and all financial centres are now engaged in the automatic exchange of financial information (through the OECD's Common Reporting Standard – CRS). Today, more than 4500 exchange of information agreements are in force with 90 jurisdictions implementing the CRS in 2018).

As a result, 47 million offshore accounts – with a total value of around 4.9 Trillion euros – have been exchanged for the first time. Over EUR 95 billion in additional revenue (tax, interest, penalties) were collected from taxpayers coming forward through voluntary compliance mechanisms and from other offshore investigations.

Drawing on previous economic surveys, the OECD's preliminary analysis shows that bank deposits in international financial centres (IFCs) have fallen by approximately 34% over the past ten years for a decline of USD 551 billion. A large part of that decline is due to the onset of the automatic exchange of information, which accounts for about two thirds of that decrease. Specifically, automatic exchange of information (AEOI) has led to a decline of 20% to 25% in the bank deposits in IFCs over the past decade.

It is my great pleasure to deliver the OECD contribution to the 60th anniversary of the CFE. The collaboration between the CFE and the OECD is longstanding. The CFE has been actively following our work since its inception in 1959 – only a few years before the publication of the 1963 OECD Model Tax Convention. Up to 2008, the OECD delivered many projects as a standard setter in the field of international taxation; for example through many amendments to the OECD Model Tax Convention, the publication of the transfer pricing Guidelines in 1979 and in 1995 and subsequent amendments, and in many other areas (harmful tax practices, tax transparency etc.). That said, I would like to focus today on the past decade, which has resulted in fast pacing and profound changes in international taxation and on the new challenges ahead. Since 2008, the OECD, supported by the G20, has developed a very ambitious tax agenda to improve tax cooperation and transparency and ensure that MNEs pay their taxes where they carry on their activities. The OECD has been the standard setter in both improving tax transparency and combating Base Erosion and Profit Shifting (BEPS) by multinational enterprises (MNEs).

In another article entitled "International Tax Dispute Resolution: New EU Rules" the CFE President discussed how international tax disputes arise and how the mutual agreement procedure framework has changed in the last few years. The article was published by the International Association of Financial Executives Institutes (IAFEI).

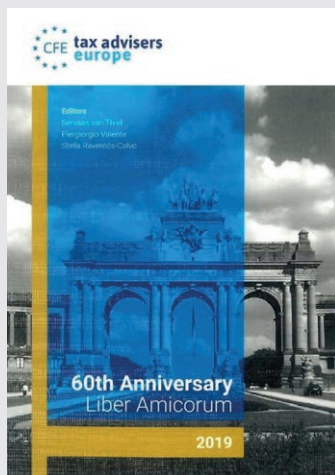
Piergiorgio Valente also had an article published in the European Taxation Tax Journal on the data-centered economy and the proper method for the evaluation of data and data processing activities. The article entitled "The Data Economy: On Evaluation and Taxation" is available in Volume 59 – Number 5 – 2019 of the IBFD Journal.

The CFE President has also written a chapter in IBFD's book "Taxing the Digital Economy – The EU Proposals and Other Insights" on digital services tax (DST), where he makes critical remarks about the DST proposals.

CFE Vice-President Anna Misiak gave an interview to the International Tax Review which was featured in two articles of the magazine. Both articles were about Mandatory Disclosure Rules (MDR) and how Poland is implementing the EU Directive. At the time, Anna Misiak criticised the legislation and questioned if the Polish tax authorities were ready to deal and comply with the EU Directive implications.



CFE 60th Anniversary Book



CFE 60th Anniversary Liber Amicorum

CFE Tax Advisers Europe Books

In 2019 CFE Tax Advisers Europe published two books to commemorate its 60th Anniversary: a 60th Anniversary Book and a Liber Amicorum.

The CFE Anniversary Book aims to give an overview of the history and development of CFE Tax Advisers Europe and examines the unique contribution the organisation has made to ongoing discussions in the international tax world.

Valère Moutarlier, Director, Direct Taxation Tax Coordination, Economic Analysis and Evaluation, DG TAXUD, kindly wrote the Foreword to the CFE 60th Anniversary Book, reflecting on the next steps for EU tax policy within the framework of the new EU Commission Presidency.

Regarding the role of CFE in the EU tax policy context Mr. Moutarlier said:

"(...) CFE has been a prominent and constructive actor in the EU's tax arena for many years now. Its contributions to consultations, 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."

Pascal Saint-Amans, Director of the Centre for Tax Policy and Administration of the OECD, wrote the Opening Remarks for the CFE 60th Anniversary Book, highlighting the long-standing collaboration between the CFE and the OECD.

On the CFE-OECD cooperation, Mr. Saint-Amans said:

"It is my great pleasure to deliver the OECD contribution to the 60th anniversary of the CFE. The collaboration between the CFE and the OECD is longstanding. The CFE has been actively following our work since its inception in 1959 - only a few years before the publication of the 1963 OECD Model Tax Convention. Up to 2008, the OECD delivered many projects as a standard setter in the field of international taxation; for example through many amendments to the OECD Model Tax Convention, the publication of the transfer pricing Guidelines in 1979 and in 1995 and subsequent amendment, and in many other areas (harmful tax practices, tax transparency etc.).(...)"

In the Liber Amicorum, compiled in honour of the 60th CFE Anniversary, renowned tax experts discuss key tax issues that challenge tax advisers, tax academics and tax officials on a daily basis. The book comprises interesting and insightful discussions on EU decision-making in the tax area in a digital world; taxpayer rights; recent developments in the fight against tax avoidance and tax evasion; in-depth analysis of VAT and cross-border rulings; and non-tax issues that may have implications on international taxation and finance.

Both books are available for purchase from the CFE Office in Brussels.

Electronic Publications



Tax Top 5

The "Tax Top 5" is a weekly e-publication containing the most relevant tax news and tax policy developments from the EU institutions, EU courts and OECD from the previous week. The weekly updates are a great success and the Tax Top 5 is now perceived as

one of the most reliable and cohesive tax policy update e-publications in Brussels.

Global Tax Top 10

The Global Tax Top 10 is a monthly publication containing a round-up of international tax policy news of wider relevance for tax advisers. The publication was developed in response to the great success of the Tax Top 5, with a view to provide a succinct report on the most impactful tax policy and legislative developments that have taken place around the globe each month.

The publication builds on a long-standing tax technical and policy cooperation between CFE, AOTCA (Asia-Oceania Tax Consultants Association) and WAUTI (West African Union of Tax Institutes), which are the leading tax professionals' organisations of the Asian-Oceanic and West African regions.

Living CFE

“Living CFE” is a bi-annual publication which details the key events and meetings attended or organised by CFE Tax Advisers Europe, technical work published or submitted to international organisations, as well as forthcoming CFE events.

EU Tax Policy Report

The EU Tax Policy Report is a journal style publication, issued bi-annually, that provides a detailed analysis of significant primary law and tax policy developments at both EU and international level which have taken place in the previous six months. It also includes an overview of selected CJEU case-law and relevant European Commission decisions.

European Register of Tax Advisers

The European Register of Tax Advisers is an online platform which forms part of the CFE Tax Advisers Europe website, and provides the opportunity for qualified tax advisers to increase their online presence and widen their professional network.

The register allows tax advisers to network through attending events organised and promoted by CFE, and provides means for the users to engage with potential clients through advertising their areas of expertise and contact details on the Register.

Below are some of the benefits of registering with the European Register of Tax Advisers:

- **Visibility:** Enhanced opportunities to increase a tax adviser’s online profile and come into contact with potential clients.
- **Network:** Opportunity to contact and collaborate with other tax experts in Europe on international taxation issues.
- **Pool of Experts:** Access to an easily searchable and centralised database of experts in various fields of taxation law and practice.
- **Sharing of Expertise:** Provides opportunities and the means to exchange knowledge with other professionals in a chosen area of taxation practice.
- **Events:** Invitations to specialised events with high profile speakers, attended by respected practitioners and representatives from European institutions.

speakers, attended by respected practitioners and representatives from European institutions.

- **Technical Updates:** Access to the latest news and publications regarding significant developments in taxation matters.

The Register platform is managed collaboratively by CFE Tax Advisers Europe and CFE’s Member Organisations. CFE takes care of the technical aspects of the Register, and Member Organisations determine whether or not to approve the registration of the users. In 2018/2019, CFE completely redeveloped the European Register of Tax Advisers. The register now contains more specific information on registered advisers and their area of expertise. This allows for enhanced visibility for tax advisers, in a modern and updated format that is far more searchable for members of the public. Any tax adviser affiliated with one of the CFE’s Member Organisations and qualified to work under European law requirements can register on the platform. Tax advisers who are not registered should consider signing up to benefit from the widening of their professional network.

Two Memoranda of Understanding between CFE Tax Advisers Europe and the Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC) were signed on 11 June 2019, under which CNDCEC members can enrol in the European Register of Tax Advisers and can attend CFE Academy’s online courses on relevant topics of European and international tax.



Piergiorgio Valente, Alessandro Solidoro, Massimo Miani and Ian Hayes

 <p>Visibility</p> <p>Enhanced opportunities to increase your online profile and come into contact with potential clients.</p>	 <p>Network</p> <p>Opportunity to contact and collaborate with other tax experts in Europe on international taxation issues.</p>	 <p>Pool of Experts</p> <p>Access to an easily searchable and centralised database of experts in various fields of taxation law and practice.</p>
 <p>Sharing of Expertise</p> <p>Provides opportunities and the means to exchange knowledge with other professionals in your chosen area of taxation practice.</p>	 <p>Events</p> <p>Invitations to specialised events with high profile speakers, attended by respected practitioners and representatives from European institutions.</p>	 <p>Technical Updates</p> <p>Access to the latest news and publications regarding significant developments in taxation matters.</p>

Six reasons to register with the European Register of Tax Advisers

General Assembly

The General Assembly in Torino and the associated social events were generously hosted by the CFE members from Italy, the Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC) and the Associazione Nazionale Tributaristi Italiani (ANTI). The Welcome Reception was held at Il Palazzo Della Luce, and the Gala Dinner was held at Villa Sassi. In 2019, the General Assembly met twice. The first meeting was on 7 June in Brussels and the second one was on 4 October in Torino.

Meetings

At the meeting in Brussels in June, CFE President Piergiorgio Valente reported on updates to CFE's strategic roadmap and milestones achieved. The Institute of Accountants and Auditors of Montenegro attended in order to make a presentation concerning their organisation and application for CFE membership. Importantly, the General Assembly also voted at the June meeting to admit the Croatian Chamber of Tax Advisers as full members of the CFE.

Under the high patronage of the European Parliament, CFE Tax Advisers Europe celebrated its 60th Anniversary with a series of events, including the General Assembly, the inaugural Global Tax Advisers Platform conference and technical committee meetings, held over three days in Torino, Italy, on 3 and 4 October 2019.

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, Head of Company Taxation Initiatives, DG TAXUD, thanked CFE for its contribution to the taxation policy work of the European Commission over the years and discussed the important role that stakeholders 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.

At the October meeting, Piergiorgio Valente reported on the milestones achieved in the second half of 2019, and presented to delegates the two finalised commemorative books that were published in order to celebrate CFE's 60th Anniversary: the Anniversary Book and the Liber Amicorum. CFE's membership also expanded in October, as the assembly voted to admit the Institute of Accountants and Auditors of Montenegro, the Association of Tax Advisors of Serbia and the Tax Advisory Chamber of Slovenia as CFE Observer Organisations. The meeting also voted to establish the New Tax Professionals group as an ad hoc committee.



General Assembly meeting in Torino



General Assembly meeting in Brussels



Pascal Saint-Amans, Director of the OECD Centre for Tax Policy and Administration addressing the CFE General Assembly in Torino



Ilya Kucherov, Radek Neužil, Jiří Nekovář, Damir Brajković



Nicola Vecchietti Massacci, Mario Boidi and Ian Hayes



Welcome Reception in Torino



Gaetano Ragucci and Piergiorgio Valente



Krister Andersson and Andrew Clarke



Ian Hayes, Munkhmandakh Bayasgalan, Chiara Ceccarelli and Martin Phelan



CFE Delegates at the Welcome Reception in Torino



Jiří Nekovář and Piergiorgio Valente



Mario Boidi, Piergiorgio Valente and Ian Hayes



Martin Phelan, Bojan Huzanić, Piergiorgio Valente and Damir Brajković at the occasion of Croatia joining the CFE as Member



Karima Baakil, Pascal Saint-Amans and Piergiorgio Valente



Gaetano Ragucci, Mario Boidi and Piergiorgio Valente



Martin Phelan, Piergiorgio Valente, Andrew Clarke and Ian Hayes



Piergiorgio Valente and Ernesto Ramojo with the GTAP Delegation



Delegation of Serbia, Slovenia and Montenegro at the General Assembly in Torino



Italian Delegation at the Gala Dinner in Torino

Organisational Structure

The **General Assembly** is the governing body of CFE Tax Advisers Europe, at which each Member State is able to be represented. The primary responsibilities of the General Assembly are to decide on the acceptance of members and observers, to approve amendments to the governing statutes, to adopt the business report of the Executive Board and to approve the accounts and budget for the CFE.











DELEGATES OF THE GENERAL ASSEMBLY IN 2019

AT	Klaus Hübner, Friedrich Rödler, Herbert Houf, Philipp Rath, Franz Schmalzl
BE	Philippe Vanclooster, André Bert, Christine Cloquet, Bart van Coile
CH	Massimo Bianchi, Thorsten Kleibold
CZ	Petr Toman, Martin Tuček, Jana Skalová, Radek Neužil, Jiří Nekovář
ES	Jesús Sanmartin, José Ignacio Alemany
FI	Timo Matikkala
FR	Marc Bornhauser
IE	Martin Lambe, Andrew Clarke
IT	Mario Boidi, Gaetano Ragucci, Giuseppe Antonio Barranco di Valdivieso, Giuseppe Zizzo, Massimo Miani, Alessandro Solidoro, Gilberto Gelosa, Noemi Di Segni
LT	Rūta Bilkštytė
LU	Olivier Remacle
LV	Ainis Dābols, Inga Kursīte-Priedīte, Daiga Zēna-Zēmane, Marina Kuzenko
ME	Rade Scekić
MT	Conrad Cassar Torregiani, Geraldine Schembri
NL	Frank van Merrienboer, Henk Koller, Sylvester Schenk, Paul Kraan, Roelof Vos, Dick Barmentlo, Paul Cramer
PT	Francisco Sousa da Câmara
PL	Dariusz Michal Malinowski, Jacek Andrzej Zieliński, Mariusz Cieśla, Lucyna Kadzikowska
RO	Dan Manolescu, Ioan Simion, Romulus Badea
RS	Ivan Simič
RU	Tatiana Ioffe
SI	Ivan Simič
SK	Jozef Danis
SM	Monica Zafferani
UA	Leonid Rubanenko, Oleg Shmal
UK	Helen Whiteman, Anthony D. Thomas, Nick Parker, Martin Manuzi

Executive Board

The **Executive Board** is in charge of the day to day work of CFE Tax Advisers Europe and reports to the General Assembly. The Board monitors developments in taxation law and the profession within Europe, and devises and manages CFE's work streams arising from these issues. Work is managed through three committees, the Fiscal Committee, the Professional Affairs Committee and the Tax Technology Committee, which are chaired by a member of the Board. The Executive Board is composed of 10 people, i.e. the President, three Vice-Presidents, the Secretary General, the Treasurer, the Chair of the Fiscal Committee, the Chair of the Professional Affairs Committee, the Chair of the Tax Technology Committee and one Executive Board Member.

EXECUTIVE BOARD 2019

	President Piergiorgio Valente		Treasurer Branislav Kováč
	Vice-President Petra Pospíšilová		Chair of the Fiscal Committee Stella Raventós-Calvo
	Vice-President Anna Misiak		Chair of the Professional Affairs Committee Wim Gohres
	Vice-President Gary Ashford		Chair of the Tax Technology Committee Ian Hayes
	Secretary General Martin Phelan		Executive Board Member Bruno Gouthière

FISCAL COMMITTEE

Delegates of the Fiscal Committee 2019

Fiscal Committee Chair: Stella Raventós-Calvo

Direct Taxes Sub-Committee

Chair: Jos Goubert

AT	Friedrich Rödler, Georg Wilfried Kofler
BE	Jos Goubert, Isabelle Richelle (expert)
CH	Pietro Sansonetti, Pascal Hinny
CZ	Lucie Wadurová, Luděk Vacík
ES	Victor Viana
FI	Timo Matikkala
FR	Olivier Dauchez
IE	Anne Gunnell
IT	Raffaele Rizzardi, Nicola Vecchietti Massacci, Giampiero Guarnerio
LT	Rūta Bilkštytė
LU	Romain Bontemps, Vanessa Ramos (expert)
LV	Ruta Tereško
MT	Geraldine Schembri, John Ellul Sullivan
NL	Adjay Pahladsingh, Stephen Brunner, Paul Kraan, Peter Flipsen, Marijke Vervoort
PL	Mariusz Cieśla, Mateusz Stańczyk
PT	Francisco de Sousa da Câmara
RO	Alin Chitu, Adrian Luca, Alin Irimia
RU	Yana Butrimovich
SI	Simona Novak
SK	Miriám Galandová
UA	Lyudmyla Rubanenko, Oleg Shmal
UK	Glyn Fullelove, Christopher Lallemand

FISCAL COMMITTEE

Indirect Taxes Sub-Committee

Chair: Jeremy Woolf

Vice-Chair: Trudy Perié

AT	Christine Weinzierl, Ingrid Rattinger
BE	Christian Amand (expert)
CH	Barbara Henzen, Willi Leutenegger
CZ	Milan Tomíček, Petr Toman, Petra Pospíšilová
ES	Jaime Rodríguez
FI	Timo Matikkala
FR	Véronique Lenoir, Laurent Chetcuti
HR	Bojan Huzanić, Ivan Čevizović
IE	David Duffy
IT	Remo Dominici, Ernesto Gatto
LT	Rūta Bilkštytė
LU	Erwan Loquet
LV	Inga Kursīte, Marina Kuzenko
MT	Chris Borg, Matthew Zampa
NL	Trudy Perié, Roelof Vos, Paul Cramer
PT	Francisco Sousa da Câmara
RO	Mariana Vizoli, Daniela Tanase
SI	Suzana Tokič, Aleksandra Heinzer, Tanja Urbanija
SK	Miriám Patiová
UA	Darya Reva
UK	John Voyez

PROFESSIONAL AFFAIRS COMMITTEE

Delegates of the Professional Affairs Committee 2019

Professional Affairs Committee Chair: Wim Gohres

AT	Friedrich Rödler, Georg Wilfried Kofler
BE	Philippe Vanclooster, Christine Cloquet
CH	Kaloyan Stoyanov
CZ	Radek Neužil, Michal Frank
ES	José Ignacio Alemany
FR	Philippe Rochmann, Bruno Gouthière
HR	Damir Brajković
IE	Martin Lambe, Martin Phelan
IT	Federico Vincenti, Maria Venturini, Gianluigi Longhi
LT	Rūta Bilkštytė
LU	John Hames
LV	Ilze Birzniece, Daiga Zēna-Zēmane, Marina Kuzenko
MT	Conrad Cassar Torregiani
NL	Dick Barmentlo, Sylvester Schenk, Frank van Merrienboer, Paul Kraan, Roel Kerckhoffs, Marloes Lammer
PL	Anna Misiak
RO	Alin Irimia, Alexander Miclev
RU	Tatiana Ioffe
SK	Miroslav Marcinčin, Adriana Horváthová, Branislav Kováč
UA	Leonid Rubanenko, Claudia Chosova
UK	Heather Brehcist, Alistair Cliff, Martin Manuzi, Nick Parker

TAX TECHNOLOGY COMMITTEE

Delegates of the Tax Technology Committee 2019

Tax Technology Committee Chair: Ian Hayes

BE	Christophe Meesters
CZ	Radek Neužil, Milan Vodička
FR	Gaëlle Menu-Lejeune
HR	Damir Brajković, Bojan Huzanić
IE	Martin Lambe, Clare McGuinness
IT	Diego Conte, Sebastiano Garufi, Alessandro Valente
MT	Conrad Cassar Torregiani
NL	Dick Barmentlo, Sylvester Schenk, Willem Faassen, Adriaan Bijleveld, Guy Thien
PL	Mariusz Cieśla, Michał Laskowski
RU	Dmitry Kirillov
UK	Gary Ashford, Ali Kennedy, Adrian Rudd, Richard Wild, Paul Aplin

ECJ TASK FORCE

Members of the ECJ Task Force 2019

ECJ Task Force Chair: Georg Kofler

Alfredo García Prats

Werner Haslehner

Volker Heydt

Eric Kemmeren

Michael Lang

Jürgen Lüdicke

Rupert Shiers

João Félix Pinto Nogueira

Pasquale Pistone

Stella Raventós-Calvo

Isabelle Richelle

Alexander Rust

Emmanuel Raingeard de la Blétière

NEW TAX PROFESSIONALS COMMITTEE

Delegates of the New Tax Professionals Committee 2019

New Tax Professionals Committee Chair: Pieter van Os

AT Markus Ehgartner, Doris Wagner

BE Philippe Vandevoorde

CZ Matej Nešleha

ES Andreu Bové

IE Gemma Tugwell

IT Diego Conte, Sebastiano Garufi, Alessandro Valente

NL Pieter van Os, Marie-Christine van der Endt

PL Bartosz Kubista

UK Heather Barnes, Julia Cockroft, Peter Coulthard,
Sharlene Botherill

In Memoriam of Professor Paolo Centore

In 2019, CFE Tax Advisers Europe was deeply saddened to hear of the passing of Professor Paolo Centore.

Professor Centore was a devoted tax professional and highly respected member of the Fiscal Committee and Indirect Taxes Subcommittee of CFE Tax Advisers Europe. His enthusiasm for his work and collaboration with CFE, his unparalleled expertise and, above all, his wonderful presence will be sorely missed.

May his soul find rest in perfect peace.



CFE OFFICE

The CFE Tax Advisers Europe office in Brussels was set up in 2000 in order to maintain relationships with the European institutions. Since the re-establishment of the CFE as an international association under Belgian law in 2011, the Brussels office is the seat and the head office of the organisation.



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IMPRESSUM

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Appendix

1. Opening Remarks of the CFE 60th Anniversary Book by Pascal Saint-Amans, Director of the Centre for Tax Policy and Administration of the OECD.
2. Foreword to the CFE 60th Anniversary Book by Valère Moutarlier, Director, Direct Taxation Tax Coordination, Economic Analysis and Evaluation, DG TAXUD, European Commission.
3. Letter from the President of the European Parliament, David Sassoli
4. The Torino-Busan Declaration by the Global Tax Advisers Platform.



It is my great pleasure to deliver the OECD contribution to the 60th anniversary of the CFE. The collaboration between the CFE and the OECD is longstanding. The CFE has been actively following our work since its inception in 1959 - only a few years before the publication of the 1963 OECD Model Tax Convention. Up to 2008, the OECD delivered many projects as a standard setter in the field of international taxation; for example through many amendments to the OECD Model Tax Convention, the publication of the transfer pricing Guidelines in 1979 and in 1995 and subsequent amendment, and in many other areas (harmful tax practices, tax transparency etc.). That said, I would like to focus today on the past decade, which has resulted in fast pacing and profound changes in international taxation and on the new challenges ahead. Since 2008, the OECD, supported by the G20, has developed a very ambitious tax agenda to improve tax cooperation and transparency and ensure that MNEs pay their taxes where they carry on their activities.

The OECD has been the standard setter in both improving tax transparency and combatting Base Erosion and Profit Shifting (BEPS) by multinational enterprises (MNEs).

OPENING REMARKS

Pascal Saint-Amans

Director of the Centre for Tax Policy and Administration of the OECD

It is now taking on a new challenge to arrive to a consensus solution to address the tax consequences arising from the digitalisation of the economy. Changes are massive, notably for tax practitioners worldwide, as they must adapt to a new and constantly evolving environment.

The Reality of Tax Transparency in Practice

While 10 years ago, bank secrecy and opaque structures were used and abused by too many taxpayers across the world to hide their assets and income from tax administrations, bank secrecy for tax purposes no longer exists in 2019 and all financial centres are now engaged in the automatic exchange of financial information (through the OECD's Common Reporting Standard – CRS). Today, more than 4500 exchange of information agreements are in force with 90 jurisdictions implementing the CRS in 2018).

As a result, **47 million offshore accounts – with a total value of around 4.9 Trillion euros – have been exchanged for the first time. Over EUR 95 billion in additional revenue** (tax, interest, penalties) were collected from taxpayers coming forward through voluntary compliance mechanisms and from other offshore investigations.

Drawing on previous economic surveys, the OECD's preliminary analysis shows that bank deposits in international financial centres (IFCs) have fallen by approximately 34% over the past ten years for a decline of USD 551 billion. A large part of that decline is due to the onset of the automatic exchange of information, which accounts for about two thirds of that decrease. **Specifically, automatic exchange of information (AEOI) has led to a decline of 20% to 25% in the bank deposits in IFCs over the past decade.**



OPENING REMARKS

Pascal Saint-Amans

Director of the Centre for Tax Policy
and Administration of the OECD

Closing the Loopholes of BEPS

Since the adoption of the OECD/G20 BEPS Package in 2015, the implementation of the standards to combat tax avoidance has been broad, consistent and is continuing through the G20/OECD BEPS Inclusive Framework.

The proper implementation of the BEPS Minimum Standards is being peer reviewed, and the below figures illustrate the magnitude of the legal and practical changes, which have strong implications for taxpayers and tax practitioners:

- **21 000** previously secret tax rulings have now been exchanged;
- **80 jurisdictions** have engaged in the exchange of **Country-by-Country reports (CBCR)** on the activities, income and assets of multinational enterprises, which began in June 2018;
- Preferential tax regimes allowed multinationals to avoid tax on their international activities, contributing to base erosion. Since 2015, **over 250 regimes have been reviewed** and virtually all of the regimes that were identified as harmful have been amended or abolished;
- With the **Multilateral Instrument to implement BEPS covering 88 jurisdictions** (including all the known treaty shopping hubs) and already ratified by 25, treaty shopping, which deprives countries of billions of euros in revenue, is also coming to an end.

Improving Tax Certainty

Tax certainty for taxpayers is an important component of investment decisions and can have significant impacts on economic growth. In 2016, the G20 Leaders called on the International Monetary Fund (the IMF) and the Organisation for Economic Co-operation and Development (OECD) to work on this issue. Wide range of activities relating to tax certainty is going on and the Update on Tax Certainty: IMF/OECD Report for G20 Fina-

nce Ministers and Central Bank Governors was issued in June 2019. Further work within the Forum on Tax Administration (FTA) is taking place to ensure members show there are positive signals that BEPS implementation is taking place in practice to seek greater consistency and tax certainty for both administrations and MNEs, in particular through closer collaboration on how they assess, identify and treat tax risk. Progress is also noted on Mutual Agreement Procedures (MAP).

Addressing the Tax Challenges Arising from the Digitalisation of the Economy

Technological innovation provides opportunities as well as challenges. In particular, digitalisation has driven considerable changes in the way business operates and led to the emergence of new business models. These changes have placed heavy pressure on the international tax system.

The BEPS Action 1 Report in 2015 in paragraph 376 under section 10.3 concluded that the digital economy raises broader tax challenges for policy makers that go beyond BEPS, and relate primarily to the allocation of taxing rights among different jurisdictions.

With many countries starting to act unilaterally, there is an urgent need to reach an agreement on a consensus solution. The G20 has agreed to seek a consensus-based solution to address the tax challenges of the digitalisation of the economy by 2020. To deliver on this, the 130 members of the OECD/G20 Inclusive Framework on BEPS have agreed on 28 May 2019 a Programme of Work on Addressing the Tax Challenges Arising from the Digitalisation of the Economy, endorsed by the G20 Finance Ministers and Leaders, to deliver, by the end of 2020, a solution to these challenges.



OPENING REMARKS

Pascal Saint-Amans

Director of the Centre for Tax Policy
and Administration of the OECD

The G20/OECD Inclusive Framework on BEPS has identified two pillars, which could form the basis for consensus.

- The first pillar focuses on the allocation of taxing rights, and seeks to undertake a coherent and concurrent review of the profit allocation and nexus rules (Pillar 1).
- The second pillar focuses on the remaining BEPS issues and seeks to develop rules that would provide jurisdictions with a right to “tax back” where other jurisdictions have not exercised their primary taxing rights or the payment is otherwise subject to effective taxation at a rate lower than a minimum rate (Pillar 2).

The OECD/G20 Inclusive Framework is actively working on reaching an agreement on the architecture of a uniform approach at the beginning of 2020. The basis for a consensus based solution will draw on the principles and commonalities shared by the current proposals under Pillar One. Agreeing such a uniform approach would require a firm commitment by the members of the Inclusive Framework at a political level, but an early agreement on the architecture of a proposal would facilitate a focus on the required technical work. It would also require much further work to deal with a number of remaining issues (e.g. scope of the measure, modalities of implementation, etc.).

The business community, including the CFE and its members, is invited to provide its comments and contributions on this project during the public consultations, the next one of which will be organised before the end of 2019.



FOREWORD

Valère Moutarlier, Director, Direct Taxation
Tax Coordination, Economic Analysis and Evaluation, DG
TAXUD, European Commission



As we approach the end of the current Commission mandate and start to prepare for a new one, it is the ideal time to reflect on the next steps for EU tax policy. It is the moment to consider what we have achieved over the past five years and what we want to achieve in the next five, and beyond. Planning the next agenda for taxation in Europe is a process that must be carefully balanced.

On one hand, there should be minimum disruption to the work already done or to the reforms which are still being implemented. On the other hand, procrastination is not an option in today's rapidly changing world, where globalisation, digitalisation and wider social change continue to undermine the more traditional structures around taxation.

The past five years have undoubtedly been the most dynamic period ever in EU tax policy. There are a number of reasons for this. Taxation became an area of increasing public interest, largely due to the financial crisis and a series of high profile media leaks.

This in turn fuelled a new political impetus around the agenda for fair and effective taxation, with a focus on delivering real results. In addition, Member States realised that, in the modern environment, taxation can no longer be treated in isolation. Its impact on economic, social, monetary, environmental and development policies has become increasingly apparent. So too has its influence on key priorities for Europe, such as competitiveness, job creation, social justice and sustainable resources. With this in mind, Member States gradually accepted that they have to work together on taxation if they are to face up to modern challenges and achieve their collective goals.

The result has been a number of significant and much-needed reforms in Europe – and beyond – in a very short space of time. These broadly fall into three categories.

First, we have created a robust new tax transparency framework and secured an unprecedented level of openness on tax matters across the EU. Member States have agreed to much greater administrative cooperation and information sharing – on both individuals and companies.

The first two Directives on Administrative Cooperation laid the ground for automatic exchange of a wide range of information on individuals' income – from employment and pension income to financial accounts. This was reinforced in 2017, following the Panama Papers revelations, to also cover information related to money laundering. Regarding companies' income, further amendments to the Directive ensured the automatic exchange of information on tax rulings and multinationals' accounts.



FOREWORD

Valère Moutarlier, Director, Direct Taxation
Tax Coordination, Economic Analysis and Evaluation, DG
TAXUD, European Commission

Meanwhile, advisors will also be required to disclose key information from 2020 onwards, to complete the transparency framework.

Second, we have substantially reinforced Member States' defences against tax abuse. The Anti-Tax Avoidance Directives (ATAD 1 & 2) contain five legally binding measures that all Member States must implement to fight aggressive tax planning. Three of these measures are already in place – CFC rules, interest limitation and the general anti-abuse rule. The other two – exit taxation and hybrid mismatch rules – will be progressively applied from 2020. With the ATAD, all Member States must now apply the same basic anti-abuse rules in a common manner, ensuring better protection for the Single Market and a more consistent environment for cross-border businesses. In a similar vein, newly agreed VAT reforms will help to reduce fraud by up to 80% and reduce the VAT gap which currently stands at around €150 billion.

The result of all these measures will be important revenue increases for public budgets, and a boost in overall taxpayer morale. We have upped our game in the fight for fair competition and a level playing field – through the Code of Conduct Group's peer reviews, the Commission's active state aid policy and the EU list of non-cooperative tax jurisdictions. The result is an overall increase in good governance standards – within the EU and globally – and a fairer tax environment for all EU Member States and companies.

Third, we have done important work during this mandate to improve the business climate for companies across Europe. The Double Taxation Dispute Resolution Mechanism, agreed in 2017, addresses one of the biggest problems that cross-border businesses face today. Thanks to this new

legislation, companies will enjoy a quicker, more definitive and more cost-effective procedure to address cases of double taxation in the Single Market. New VAT rules will also bring big improvements for businesses, by simplifying compliance procedures and ensuring that the system is better aligned to the needs of e-commerce.

Despite these success stories, the work started in this mandate is not finished yet. The Common Consolidated Corporate Tax Base – the most ambitious of all tax reforms – still sits on the negotiating table. Member States have failed to reach consensus so far, even though the CCCTB offers the chance to make the Single Market substantially more competitive and attractive from a tax perspective. Likewise, there is no sign of agreement yet on the VAT Definitive Regime, even though it would drastically reduce administrative burdens for businesses, cut down on fraud and simplify processes for tax administrations.

The common obstacle in both cases is the need for unanimous agreement on any tax file at EU level. As set out in the Commission's Communication last January, the unanimity rule appears now to be outdated and counter-productive. In this day and age, one or two Member States should not be able to block real progress in EU tax policy, to the detriment of all the others and at a cost to the Single Market.

The Commission has opened the debate on whether unanimity in taxation is still defensible in our modern climate, and Member States now need to take this issue forward. Indeed, now is the right time for such a debate, as we enter a new period for EU tax policy.



FOREWORD

Valère Moutarlier, Director, Direct Taxation
Tax Coordination, Economic Analysis and Evaluation, DG
TAXUD, European Commission

The future agenda will be shaped by many different considerations – political motivations, global developments, public demands and economic needs. However, a few major themes can already be identified, based on issues that need to be urgently addressed.

First, questions around the taxation of the digital economy will continue to grow and develop. The Commission kick-started the work in this area in 2018 with two practical proposals. Although no consensus has been reached on these proposals in Council, they put the EU in "first mover" position on digital taxation and injected more momentum into the international work in this area. This is now charging ahead at full speed, and the discussion has become much wider than simply a quest to solve the digital dilemma. The whole global framework for international taxation is now being examined, to make it fairer, more effective and better fit to tomorrow's world. The G20 has promised to present solutions by the end of 2020, and the EU will be at the forefront in steering this work.

The second trend that is clearly emerging is the heightened focus on energy and climate change. Taxation will be central to the wider policy decisions in these areas. The "polluter pays" principle is more relevant than ever and should be reflected at every level. At the same time, the social and economic consequences of new tax measures also need to be carefully considered. There is no doubt that the new Commission will need to give high priority to finding balanced and workable solutions in this area.

Finally, we cannot ignore the calls from both businesses and tax administrations for a simpler and more stable tax landscape. Tax certainty has been on the agenda for some time now, but is likely to become an even higher political priority in the years ahead.

Obviously, work will continue on the level playing field and fair competition – both of which are crucial for a healthy business environment. However, greater focus may also be needed on the other challenges that companies face, whether this is double taxation, administrative complexities or high compliance costs.

Likewise, tax administrations could cooperate more closely and develop common tools to improve tax certainty, reduce disputes and encourage good tax practices. If increased tax certainty can bring more investment and increased compliance, then everyone is a winner. So it is a goal we should pursue with vigour.

The past 5 years have seen a paradigm shift in EU tax policy, in terms of the level of ambition, the scope of the objectives and the pace of change. This should continue in the years ahead, even if the political attention shifts to new areas.

CFE has been a prominent and constructive actor in the EU's tax arena for many years now. Its contributions to consultations, 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 President

D 312670 30.09.2019

Mr Aleksandar Ivanovski
Confédération Fiscale Européenne (CFE – Tax Advisers Europe)
Avenue de Tervueren 188A
1150 Brussels
BELGIUM

Dear Mr Ivanovski,

Thank you for your online application of 3 September 2019 seeking the patronage of the European Parliament for the 60th anniversary of the *Confédération Fiscale Européenne – CFE Tax Advisers Europe* to be held in Turin on 4 October 2019.

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.

As you are aware, the power to tax is in the hands of the Member States, with the European Union having only limited competences. However, as EU tax policy is geared towards the smooth running of the single market, the harmonisation of indirect taxation, and the fight against harmful tax evasion and tax avoidance, have become EU policy priorities. In this framework, and in the context of other policies, the consultation and the exchange of information on national tax laws and practices, and on the coordination and development of tax law in Europe between national tax advisers, and between national tax advisers and the European institutions, are both necessary and extremely useful.

For that reason, the institution I have the honour to preside over greatly appreciates the professional and committed work of your organisation. It also highly values your activity as an important partner in the last European elections campaign.

It is therefore with great pleasure that I grant your event the European Parliament's patronage¹.

May I take this opportunity to wish you every success with what should be an excellent event.

Yours sincerely,



David Maria SASSOLI

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4 SHORT-TERM PRIORITIES
IN INTERNATIONAL TAXATION

THE
TORINO-BUSAN
DECLARATION

[3 OCTOBER 2019]





THE TORINO-BUSAN DECLARATION

GTAP is an international organisation uniting tax professionals from around the world. The term “tax professionals” includes persons engaged at professional level with tax consultancy, as lawyers or as accountants, and accredited as such pursuant to applicable national law, irrespective of membership of GTAP.

The principal purpose of GTAP is to promote the public interest by ensuring the fair and efficient operation of national and international tax systems including recognition of the rights and interests of taxpayers and the role of tax professionals. To this end, GTAP provides the forum for the regular meeting, exchange programme, dialogue and interaction of tax experts from all continents.

On the occasion of the coinciding GTAP meetings in Torino and in Busan, **GTAP is hereby defining 4 key short-term priorities for the pursuit of its principal purpose and aspiring to contribute and shape contemporaneous developments in global taxation.**



THE TORINO-BUSAN DECLARATION

1. Tax for Growth

Welfare and progress of the global community presupposes continuous development at a sustainable rate. Taxation is one of the main factors influencing growth and development. It has been evidenced that the distribution of the tax burden can encourage or discourage economic development. Moreover, tax policy determines the key direction of development, e.g. from gender-responsive & equality-promoting policies to sustainable environmental protection.

Constructing a global tax framework that encourages stable economic growth, widely diffused around the globe and oriented towards improvement of living conditions for all is one of GTAP's principal aspirations.

Developing countries, and the rate of economic growth, are particularly affected by the new trends in international taxation. Working together, we are committed to promoting inclusive and growth-inducing taxation policies. In particular, we share the commitment to improving tax morale as a policy course of action with the most meaningful impact on capacity building and economic growth.

GTAP members aspire to promote policies on increased tax certainty and voluntary compliance as a means for improved tax good governance.



THE TORINO-BUSAN DECLARATION

2. Tax and Climate Change – Sustainable Tax Policies

Climate changes affects us all. Indeed, the intention of a carbon tax is environmental, to reduce emissions of carbon dioxide and thereby slow climate change. GTAP members aspire to share their unique knowledge on tax with governments and other international stakeholders in the process of transition to a low carbon global economy.

Tax policy is a key tool to internalise environmental costs and foster the transition to a low carbon economy, for the generations to come. Future-proof tax systems are an equilibrium between today's public finance needs and tomorrow's sustainable policies.



THE TORINO-BUSAN DECLARATION

3. Tax and Digitalisation

Today, growth is defined largely within the digital framework. Digital technologies have become an integral part of business and everyday life and their impact is expected to expand over time. Therefore, a global approach to dealing with the digital side of the economy is essential.

Digitalisation is simultaneously advancing and disrupting trends in technology, transportation, education and healthcare. Identifying tax rules that can inspire consensus of national legislators around the globe is essential to foster this digital era for the service of humanity. In the area of taxation, digitalisation exacerbates the perceived mismatch between where the value is created and where taxes are paid, which affects the perception of fairness in our tax systems, across borders and nations. Therefore, these significant cross-jurisdictional issues merit a global response, whilst the new “single global tax jurisdiction” demands rules of broad consensus.

We are ready to embrace this change. Due to the fast-paced change of the digital environment, today’s solutions must be future-proof and consistent with the principle of aligning profit with underlying economic activities and value creation. GTAP calls for a coordinated international tax policy response to the challenges posed by digitalisation.



THE TORINO-BUSAN DECLARATION

4. Taxpayers' Rights and Certainty in a Fast-Paced World

Sustainable growth is contingent on effective tax compliance. As such, taxpayers' active and willing compliance ensures more efficient collection of sufficient resources, necessary for fulfilment of the social contract between citizens and governments. When taxpayers' rights are not sufficiently guaranteed, taxpayers' active and willing compliance is undermined. A tax framework that cannot adequately address the current evolving reality results in uncertainty at the expense of tax compliance and economic growth.

Consequently, in a dynamic global economic framework, taxpayers' rights should serve as a beacon of certainty. Certainty with equity, simplicity, and convenience have been noted as the ingredients of an efficient tax system.

GTAP underlines the fundamental importance of taxpayers' rights for tax good governance, and the role played in this respect by the statements of taxpayer, and tax administration, rights and obligations.

To this end, GTAP members urge governments and international bodies to promote a "fundamental right of tax certainty". This right is promulgated in the Model Taxpayer Charter, an initiative of GTAP organisations, CFE Tax Advisers Europe, AOTCA and STEP.



Founders:

CFE



AOTCA

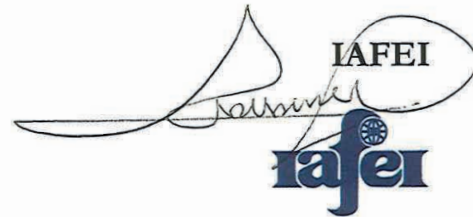


WAUTI





Observers:



A series of horizontal dotted lines for writing notes.



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