



DIRECT TAX

Transfer pricing: OECD consults on Revised Discussion Draft on Intangibles and White Paper on Documentation

On 30 July 2013, the OECD opened two public consultations in the area of transfer pricing.

The first of these concerns the Revised Discussion Draft on Intangibles; the initial discussion draft was published in June 2012 and opened for public comments later that year. OECD points out that, as intangibles are among the areas to be addressed in the course of its BEPS (base erosion and profit shifting) project, also the Revised Discussion Draft should be considered a work in process.

Secondly, the OECD has released a White Paper on Transfer Pricing Documentation to initiate a discussion of ways in which compliance with transfer pricing documentation requirements can be made simpler and more straight-forward, while at the same time providing tax authorities with more focused and useful information for consideration in connection with transfer pricing risk assessment and transfer pricing audits. Over the last 20 years, transfer pricing documentation requirements have rapidly spread around the world. The proliferation of transfer pricing documentation requirements, combined with a dramatic increase in the volume and complexity of international intra-group trade and the heightened scrutiny of transfer pricing issues by tax authorities, makes transfer pricing documentation one of the top tax compliance issues on the agendas of both tax authorities and businesses. The White Paper is issued as a first step in soliciting public comments.

Closing date for both consultations is 1 October 2013. Comments are also welcome on the most appropriate means of implementing the transfer pricing documentation directives of the BEPS Action Plan. OECD plans to hold a stakeholder meeting on transfer pricing issues on 12 – 13 November 2013.

READ MORE (click to open):

Intangibles:

Press release: [EN](#) ([FR](#) available)
Revised Discussion Draft: [EN](#)

READ MORE (click to open):

Documentation:

Press release: [EN](#) ([FR](#) available)
White Paper: [EN](#)

OECD presents Action Plan on BEPS

On 19 July 2013, the OECD has published its „Action Plan on Base Erosion and Profit Shifting“, which defines 15 specific actions to counter the erosion of the tax base through profit shifting by companies.

The basic assumption of the analysis is that the principles of the current international taxation system have not been able to face the significant changes that have affected economy throughout globalization. Besides, businesses, in particular multi-national enterprises (MNEs), have organized their structure using all their technical knowledge to exploit the existing loopholes and mismatches in the legal systems for significantly reducing their tax burden. The 15 defined actions are planned to be enacted in the next 12-24 month, according to a detailed 3-steps calendar.

The BEPS action plan includes four core areas, namely: (1) transfer pricing (actions 8, 9, 10 and 13); (2) treaty revision (actions 6, 7, 14 and 15); (3) tax-base backstop matters (actions 1 to 4 and action 5 partially); and (4) information exchange and disclosure (action 5 partially and actions 11 and 12). The general theme of aligning the place of the economic activity with the right to tax runs through the whole essay. In order to achieve this, the revision of the fiscal treatment of digital good and services, intangibles, hybrid instruments and entities, intra-group trades and loans, anti-abuse rules and harmful preferential regimes are identified as the main practical concerns.

In detail, the Action Plan sets out the following 15 actions:

- 1) Digital economy: addressing the main issues that the trading of electronic goods and services raise, i.e. the connection between the value produced and the corresponding territory, that should have the right to tax that wealth;
- 2) Hybrid mismatch arrangements: updating the OECD Model Convention and the specific recommendations aimed at tackling „double non-taxation“

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and „double deduction“ arising from the use (abuse) of hybrid entities and instruments;

3) Controlled Foreign Companies (CFC): to develop a set of recommendations to involve and support States in adopting effective internal CFC rules;

4) Passive interest expenses and other financial payments: in relation with the work on hybrid mismatch arrangements and CFC rules, a revision of the rules that make possible the erosion of the national tax base using intra-group financing transactions;

5) Harmful tax practices: to counter harmful tax practices through national preferential regimes and to provide transparency and exchange of information on the use of these schemes; this should be extended also to non-OECD countries;

6) Treaty abuse: amendments to the OECD Model Convention and specific recommendations aimed at preventing the abuse of the tax treaties by entities who had no right to take advantage of the provisions of the Convention (e.g. by using a conduit company);

7) Permanent Establishment: to update the definition of permanent establishment to prevent erosion of the tax base related to the avoidance of this status, namely through the use of „commissionaire arrangements“;

8) Intangibles in transfer pricing: the formal property of intangible assets inside multinational groups is one of the most used methods to shift profits. The aim is to review the provisions of the OECD Guidelines on this matter and to deliver consequential changes to the Model Tax Convention;

9) Allocation of risks and capital in transfer pricing: adoption of specific rules on the allocation of risks and capital within multinational groups for profit shifting;

10) High risk transactions in transfer pricing: changes to the OECD Guidelines should prevent the manipulation of intra-group profits allocation through inter-company transactions considered „high risk“, through changes to the Model Convention and possibly to the Transfer Pricing guidelines;

11) Collection and analysis of data on BEPS: recommendations concerning the collection of data on the phenomenon and the impact of counter measures;

12) Disclosure: design of mandatory disclosure rules for aggressive or abusive transactions, arrangements or structures, using a modular design to allow for consistency. Co-operative compliance programmes between taxpayers and tax administrations are men-

tioned as a potentially useful measure;

13) Transfer pricing documentation: redefinition of the rules on the documentation on transfer pricing for MNEs. Primarily, this will involve the adoption of a common template by which these companies have to provide to all the relevant governments the requested information on the global allocation of their income, economic activities and taxes paid among countries;

14) Dispute resolution: to deliver solutions to address obstacles that prevent countries from solving treaty-related disputes under mutual agreement procedures (MAP), including the absence of arbitration provisions in most treaties and the fact that access to MAP and arbitration may be denied in certain cases;

15) Development of a multilateral legal instrument allowing interested countries to amend their bilateral tax treaties in a more efficient and coherent way, to respond quickly to BEPS issues;

It remains to be seen whether the current broad consensus among (developed and emerging G20) countries will persist when the announced measures are to be implemented, given that the Action Plan expressly states that it is „not directly aimed at changing the existing international standards on the allocation of taxing rights on cross-border income“, so just at restoring their proper operating.

INDIRECT TAX

EU Council agrees on VAT Implementing Regulation on place of supply of services

On 21 June 2013, the Ecofin Council has reached a political agreement on the Implementing Regulation amending Regulation 282/2011/EU on the place of supply of services, now also including internet telephony (Voice over IP).

READ MORE (*click to open*):

Agreed text: [EN](#)

Council approves quick reaction and reverse charge mechanism to tackle VAT fraud schemes

On 22 July 2013, the EU Ecofin Council adopted two directives to combat VAT fraud through facilitating the rapid adoption of legislative responses to fraud

INDIRECT TAX

schemes (quick reaction mechanism) and allowing the temporary application of the reverse charge mechanism in relation to supplies of certain goods and services susceptible to fraud. This is to tackle so-called carousel fraud, where supplies are rapidly traded several times without payment of VAT. Until now, such situations have been dealt with either by amendments to the VAT directive or through individual derogations granted to member states under that directive. Both require a proposal from the Commission and a unanimous decision by the Council, a process that can take several months.

READ MORE *(click to open)*:

Press release: [EN](#)

Amendments:

quick reaction mechanism: [EN](#)

reverse charge mechanism: [EN](#)

Commission publishes updated VAT and excise duty tables

On 1 July 2013, the European Commission has published its regularly updated overview on VAT rates and on rates and receipts from excise duties, namely on alcoholic beverages, manufactured tobacco products and energy products.

READ MORE *(click to open)*:

VAT rates overview: [EN/FR/DE](#)

Alcoholic beverages:

Rates: [EN](#)

Tax receipts: [EN](#)

Energy products:

Rates: [EN](#)

Tax receipts: [EN](#)

Manufactured tobacco:

Rates: [EN](#)

Tax receipts: [EN](#)

ECJ rules on payment of customs duties and VAT on goods stolen while under customs warehousing arrangements

The European Court of Justice has ruled on 11 July 2013 in the preliminary ruling case Harry Winston (case C-273/12), upon reference of the French Cour de Cassation that a theft of goods placed under customs warehousing arrangements constitutes an unlawful removal of those goods, giving rise to a customs debt on importation. Also as concerns VAT, the theft gives rise to the chargeable event so that tax must be paid.

READ MORE *(click to open)*:

Judgment: [EN](#) (all EU languages)

VAT: Input deduction for supplies of goods and services to staff supplied by another company must be possible

On 18 July 2013, the European Court of Justice decided the preliminary ruling case C-124/12 ("AES"), referred by the Administrative Court of Plodiv/Bulgaria, concerning the right to deduction of input VAT paid on the purchase of various goods and services for employees who are supplied to AES by another company. The ECJ held that the VAT Directive precludes national legislation under which a taxable person which incurs costs for transport services, work clothing, protective gear and business trips for staff working for that taxable person does not have the right to a deduction of the VAT relating to those costs on the ground that that staff is provided to it by another entity and accordingly cannot be regarded, for the purposes of that legislation, as members of the taxable person's staff, despite the fact that those costs can be regarded as having a direct and immediate link with the general costs connected with all the economic activities of that taxable person. A member state, on its accession to the EU, may not introduce a limitation on the right to a deduction under a national legislative provision which excludes the right to a deduction of goods and services intended to be supplied free of charge or for activities outside the scope of the taxable person's economic activity, when such an exclusion was not provided for in the national legislation in force until the date of that accession. The referring court has to interpret the provisions of domestic law in the main proceedings, so far as possible, in accordance with EU law. Where this proves impossible, the referring court is required to set aside those provisions.

INDIRECT TAX

READ MORE (click to open):

Judgment: [EN](#) (all EU languages)

ECJ limits a trader's duties to check the use of purchases by a trader from another member state

The European Court of Justice has decided on 18 July 2013 in the preliminary ruling case Metro Danmark (C-315/12), upon reference of the Danish Højesteret, that a trader is not required to check whether purchasers from other member states intend to import products subject to excise duty into another member state and, where relevant, whether such importation is for private or commercial use.

READ MORE (click to open):

Judgment: [EN](#) (all EU languages)

"Supply of goods" for VAT input deduction is not linked to acquisition of ownership

The European Court of Justice has decided on 18 July 2013 in the preliminary ruling case Evita-K (C-78/12), upon reference of the Administrative Court of Sofia, that, in the context of the exercise of the right to deduct VAT, the concept of 'supply of goods' and evidence that such a supply has been carried out are not linked to the acquisition of ownership of the goods concerned. It is for the referring court to carry out, in accordance with the national rules relating to evidence, an overall assessment of all the facts and circumstances of the dispute before it in order to determine whether the supplies of goods at issue in the main proceedings were actually carried out and whether, as the case may be, a right to deduct may be exercised on the basis of those supplies.

The case concerned the refusal of the right to deduct, in the form of a tax credit, VAT relating to invoices concerning the delivery of calves intended for slaughter. The ECJ also limited the accounting and VAT documentation requirements for such supplies.

READ MORE (click to open):

Judgment: [EN](#) (all EU languages)

ECJ: VAT paid for management and operation of a pension fund for employees is deductible

The European Court of Justice has decided on 18 July 2013 in the preliminary ruling case "PPG" (C-26/12), upon reference of the Court of Leeuwarden/NL, that a taxable person who has set up a pension fund in the form of a legally and fiscally separate entity in order to safeguard the pension rights of his employees and former employees, is entitled to deduct the VAT he has paid on services relating to the management and operation of that fund, provided that the existence of a direct and immediate link is apparent from all the circumstances of the transactions in question.

READ MORE (click to open):

Judgment: [EN](#) (all EU languages)

Opinion of Advocate-General Sharpston: [EN](#) (all EU languages)

ECJ: Making available of a company's immovable property to a manager for private use is no exempt letting

The European Court of Justice has decided on 18 July 2013 in the preliminary ruling cases Medicom and MPA (C-210 and 211/11), upon reference of the Belgian Cour de Cassation, on the deduction of input VAT paid in respect of real property used partly for private use by the managers of those companies. The ECJ held that the making available of immovable property belonging to a legal person to its manager for his private use, without there being provision for the beneficiaries of that arrangement to pay a rent for the use of that property may not be an exempted letting of immovable property within the meaning of the VAT Directive. This is not changed by the fact that this making available of that property is deemed under national income tax legislation to be a benefit in kind stemming from the beneficiaries' performance of their corporate duties or under their contract of employment.

INDIRECT TAX

READ MORE (*click to open*):

Judgment: [EN](#) (all EU languages)

ADMINISTRATIVE COOPERATION AND FIGHT AGAINST TAX FRAUD

OECD announces to G20 creation of single global standard for tax information exchange

On 20 July 2013, the OECD presented to G20 finance ministers a proposal to increase international tax cooperation and transparency through the promotion of a single global standard on automatic tax information exchange between countries to counter tax avoidance and evasion from both companies and individuals. This is meant to complement the BEPS (see separate article in this Report) Action Plan which is dealing with companies only. The new standard is expected to be endorsed by the G20 which will call on all jurisdictions to commit to its implementation. It should be operational in 2014.

The proposal provides:

- A definition of the financial information to be exchanged automatically: interest, dividends, account balance and income from certain insurance products, sales proceeds from financial assets and other income generated by assets or from payments made with respect to the account.
- The development of an operational platform. The OECD points out that for automatic exchange of information to function effectively, the right legal and administrative framework needs to be in place to ensure confidentiality and to avoid misuse of the data transmitted. Common reporting and due diligence rules, supported by compatible technology and software, will be developed in the coming months.
- The establishment of a multilateral legal platform. This contains strict rules on confidentiality and proper use of information. More than 70 jurisdictions, including all G20 countries, have so far signed the Convention on Mutual Administrative Assistance in Tax Matters. Building on this, the report calls on the G20 to support the development of a standardised agreement to allow signatories of the Convention to opt into automatic exchange of information. Developing such

a model agreement could be completed by the end of 2013 with detailed guidance available in the first half of 2014, according to the report.

READ MORE (*click to open*):

Press release: [EN](#) ([FR](#) available)

OECD Report to the G20: [EN](#), consisting of:

- a) Progress Report: Global Forum Update on Effectiveness and On-going Monitoring;
- b) Report: Base Erosion and Profit Shifting (BEPS) and Automatic Exchange of Information;
- c) Annexes: BEPS Action Plan and June 2013 G8 Report: A step change in tax transparency

UN Committee of Experts presents Guide on setting up Mutual Agreement Procedures between (developing) countries

The Guide has been produced by the UN Committee of Experts on International Cooperation in Tax Matters' Subcommittee on Dispute Resolution, considering different possible ways to improve mutual agreement procedures, including advance pricing agreements, mediation, conciliation, recommended administrative regulations and prescribed obligations for the taxpayer applying for mutual agreement procedure. The primary focus of the work is on the specific needs and concerns of developing countries and countries in transition where experience with the mutual agreement procedure is often insufficient, including a practical guide to that procedure. The Guide draws on the OECD Manual on Effective Mutual Agreement Procedures but is based on the updated UN Model Double Taxation Convention between Developed and Developing Countries and seeks to present the various aspects of the mutual agreement procedure from the perspective of countries that have limited experience with that procedure.

READ MORE (*click to open*):

UN Guide on Mutual Agreement Procedures [EN](#)

Information exchange: OECD Global Forum publishes new reviews of jurisdictions

ADMINISTRATIVE COOPERATION AND FIGHT AGAINST TAX FRAUD

On 31 July 2013, the Global Forum on Transparency and Exchange of Information for Tax Purposes has released peer review reports assessing the information exchange regimes of 13 jurisdictions. Later this year, most of these reviews will feed into the ratings assigned to 50 jurisdictions, backing G20 and Global Forum efforts to strengthen tax cooperation and stamp out cross-border tax evasion.

Eleven "Phase 2" reports (concerning the functioning of exchange of information in practice) review Austria, Bermuda, Brazil, British Virgin Islands, India, Luxembourg, Malta, Monaco, Qatar, San Marino and The Bahamas. Two "Phase 1" reports look at the legal and regulatory framework for transparency and exchange of information in Israel and Lithuania. All the reports assess the jurisdictions' commitment to the international standard for tax information exchange. To date, the Global Forum has reviewed 98 jurisdictions.

READ MORE (click to open):

Press release with links to peer review reports:
[EN](#)

STATE AID

Commission opens in-depth investigation into amended Spanish tax scheme for acquisition of shares in foreign companies

On 17 July 2013, the European Commission has opened an in-depth investigation to verify whether the new interpretation of a Spanish scheme allowing tax deductions in connection with the acquisition of shareholdings in non-Spanish companies is in line with EU state aid rules. The Commission had found the original version of the scheme incompatible with these rules because it gave the beneficiaries a selective economic advantage over their competitors performing domestic acquisitions. According to consistent administrative practice, the original scheme applied only to direct acquisitions, whereas the new Spanish interpretation would retroactively allow tax deductions also for indirect acquisitions. At this stage, the Commission considers that the amended scheme may again involve state aid and has doubts as regards the compatibility of such aid. The opening of an

in-depth investigation does not prejudice the outcome of the investigation. In order to avoid more public spending that may have to be recovered afterwards, the Commission has ordered Spain to stop applying the new administrative interpretation until the Commission has taken a final decision on its compatibility (suspension injunction).

In 2009 and 2011, the Commission had ordered Spain to abolish the corporate tax provision allowing companies to amortise over 20 years the „financial goodwill“ deriving from acquisitions of shareholdings in foreign countries. The Commission also limited the recovery of the unlawful aid, due to the existence of legitimate expectations for some beneficiaries. Spain committed not to grant the exemption to any new beneficiaries but did not abolish the provision, as amortisation is still possible in certain cases where the Commission recognised legitimate expectations or authorised a transitory period.

However, in March 2012 the Spanish authorities adopted a new binding administrative interpretation, extending the scope of application of the measure, which would now also be applicable to financial goodwill deriving from indirect acquisitions.

Interested third parties may submit comments within one month from the publication of the decision in the EU's Official Journal.

READ MORE (click to open):

Press release : [EN](#) (available in FR, DE, ES)

State aid reform: Council adopts two new regulations

On 22 July 2013, the EU Competitiveness Council adopted the "Enabling Regulation" and the "Procedural Regulation" in the context of the reform of the EU state aid framework. The Enabling Regulation is the legal basis for the Commission for granting block exemptions for certain aids considered compatible with the TFEU from the prior notification and approval procedure. The changes to the Enabling Regulation will allow the Commission to apply a simplified control procedure to certain categories of aid. New types of aid have been included as well, such as aid granted to culture and innovation and aid to repair the damage caused by natural disasters. Completion of the state aid reform is envisaged by the end of 2013.

READ MORE (click to open):

Council press release: [EN](#)

COMPANY LAW

EP recommends amendments to European Foundation Statute

On 2 July 2013, the plenary of the European Parliament adopted an interim report on the proposal for a European Foundation (FE) Statute made in February 2012 (see [CFE European Tax & Professional Law Report February 2012](#)). An interim report is delivered when legislation follows the consent procedure according to which the EP can either approve or dismiss a legislative proposal in its entirety. Amendments by the Parliament can only be made in the form of recommendations to the Council. If the Council follows these recommendations without making amendments of its own, the consent of the Parliament is deemed given.

Recognising the need for an optional European legal form for foundations and stressing that the introduction of a common Statute for a FE could make it easier for foundations to package and transfer resources, expertise and donations and to pursue their activities throughout the EU, the EP seeks to introduce a number of changes :

To strengthen financial supervision and sustainability of the FE, the Parliament suggests, i.a., rules on the place of registered office and headquarters, maintenance of a minimum level of assets (€ 25,000), a minimum duration of existence of four years, a reasonableness and proportionality clause for remuneration paid to the governing board, employee participation, a derogation from the audit requirement for foundations not exceeding a certain threshold and provisions against conflicts of interest. It also wants to establish a provision according to which a FE must spend 70% of its income in a given financial year within the following four years.

The Parliament also seeks to limit the proposal to a civil law instrument, departing from the approach of automatic application of equal tax treatment proposed by the Commission. This may result in the FE being much less attractive from a tax point of view.

READ MORE (click to open):

Commission proposal: [EN](#) (all EU languages)

Interim report : [EN](#) (all EU languages)

Interim Report, summary by EP: [EN](#) (FR available)

OTHER TAX NEWS

Lithuanian Council presidency names its tax priorities

These priorities, much in line with the European Commission's agenda, were presented to the Ecofin Council on 9 July 2013: They include the fight against tax fraud and evasion. The Presidency will seek to reach political agreement on the Savings Taxation Directive and start work on the legislative proposal of 12 June 2013 to extend the scope of the Administrative Cooperation Directive in order to widen the automatic exchange of information (see [CFE European Tax & Professional Law Report June 2013](#)). The Lithuanian Presidency will also aim for progress in discussions on the rules governing VAT

treatment on vouchers. In addition, the discussions will be continued regarding the draft directive on a Common Consolidated Corporate Tax Base (CC-CTB). Finally, the Presidency will carry forward the discussions on a financial transaction tax and the proposal for a review of the Energy Taxation Directive.

READ MORE (click to open):

Ecofin work programme: [EN](#)

UN Committee of Experts on International Tax Cooperation appoints new members

The United Nations Economic and Social Council (Ecosoc) has published a note listing the 25 new members of its Committee of Experts on International Tax Cooperation. The experts have been selected for a term of four years from candidates proposed by UN member states. CFE has NGO consultative status with the UN Ecosoc and regularly participates in the annual meetings of the Committee of Experts. This year's meeting will take place from 21 to 25 October.

READ MORE (click to open):

Note on the new members of the Committee: [EN](#)

Committee of Experts website: [EN](#)

Agenda of the 21-25 October 2013 meeting: [EN](#)

EVENTS

Commission to organise two public conferences on VAT and tax expenditures in times of fiscal consolidation in October/November

The European Commission DG TaxUD has announced its intention to host a “Brussels Tax Forum” on “an efficient VAT system” on 18 November 2013. A detailed programme with possibility to register will be published towards the end of September.

Also DG ECFIN will again organise a workshop on taxation, on 23 October 2013, on “the use of tax expenditures in times of fiscal consolidation”. A programme is already available; registration will be possible as of early September.

Participation in both events is free.

READ MORE (click to open):

Brussels Tax Forum:

More information available as of end of September 2013: [EN](#) (FR, DE available)

ECFIN workshop: [EN](#)

CFE EVENTS

International Tax Forum “International Tax Strategies: an outlook on current worldwide developments and the Russian perspective”

The International Tax Forum, organised by the Russian Chamber of Tax Advisers on the topic “International Tax Strategies: an outlook on current worldwide developments and the Russian perspective” will take place on Thursday 19 September 2013 in St. Petersburg, Russia.

READ MORE (click to open):

CFE website: [EN](#)

PROFESSIONAL QUALIFICATIONS

EP Committee adopts professional qualifications compromise

On 9 July 2013, the compromise text for the revision of the Professional Qualifications Directive (see [CFE European Tax & Professional Law Report June 2013](#)) was, as expected, adopted by the European Parliament’s responsible IMCO (Internal Market and Consumer Protection) Committee. Adoption by the EP plenary is scheduled for October 2013.

READ MORE (click to open):

Compromise text: [EN](#) (all EU languages)

ANTI MONEY LAUNDERING

EP Development Committee delivers opinion on 4th Anti Money Laundering Directive proposal

The European Parliament’s LIBE Committee has still not produced a draft report on the European Commission’s proposal for a 4th Anti Money Laundering Directive, published in February 2013. An opinion has been rendered by the Committee on Development on 26 June 2013, asking for a public register of beneficial owners of companies established in the EU. This goes further than the ECON Committee opinion of 19 June favouring a beneficial owner register accessible (only) to authorities and obliged entities (this includes professionals entrusted with tasks in the fight against money laundering, like tax advisers).

READ MORE (click to open):

DEVE Opinion: [EN](#)

ECON Opinion: [EN](#)

CFE EVENTS

CFE Professional Affairs Conference
“Change of climate in taxation:
Are you prepared for extended
responsibilities?”
on 22 November 2013 in Milan

A programme of the conference is now available. .

[READ MORE \(click to open\):](#)

CFE website: [EN](#)

CFE PUBLICATIONS

CFE revises European Professional
Affairs Handbook for Tax Advisers

The CFE presented the 2nd edition of its European Handbook on professional affairs issues for tax advisers.

[READ MORE \(click to open\):](#)

Order at [IBFD](#) / more information: [CFE Website](#)

A Model Taxpayer Charter

The draft Model Taxpayer Charter presented in May 2013 by CFE, AOTCA and STEP (see [CFE European Tax & Professional Law Report May 2013](#)), is now available for download. The full publication including the study on the status quo of taxpayer rights and responsibilities on 37 countries has been made available at a reduced price of € 30 (including shipping) for the members of CFE member organisations.

[READ MORE \(click to open\):](#)

Text of the draft Model Taxpayer Charter: [EN](#)

Dedicated CFE website: [EN](#)

If interested, please contact the CFE Office in Brussels: [Order](#)



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IMPRESSUM

Confédération Fiscale Européenne
 -The European Federation of Tax Advisers-
 188A, Av. de Tervuren
 B-1150 Brussels

Editor: Rudolf Reibel, LL.M., CFE Fiscal and Professional Affairs Officer

Co Editor: Roberto D'Arminio

If you have any suggestions or questions, please feel free to contact the editor:
brusselsoffice@cfe-eutax.org

Layout: Laëtitia Bois, Management Assistant

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