



World Tax Advisor

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French 2019 finance bill contains BEPS / EU ATAD 1 measures

The bill would bring the patent box regime in line with the OECD's "modified nexus approach," implement the ATAD 1 interest deduction limitation rules and make changes to the participation exemption.



Australia

R&D tax measures introduced into parliament

The bill includes measures to enact the proposed changes to the research and development tax incentive



European Union

Commission finds no impermissible state aid in Luxembourg tax ruling case

The European Commission has concluded that the non-taxation in Luxembourg of certain profits

scheme originally announced in the May budget.

allocated to an entity's US branch did not constitute state aid.



Netherlands

Consultation on tax treaty policy and low-tax jurisdictions list

A public internet consultation, covering proposed amendments to the tax treaty policy and a new list of low-tax jurisdictions, closes on 22 October 2018.



New Zealand

Perspectives on Tax Working Group interim report

The report provides a range of recommendations, including retaining the 28% corporate tax rate, but does not conclude whether New Zealand should have a capital gains tax.



Nigeria

FIRS releases new transfer pricing rules

The revised transfer pricing rules apply for purposes of capital gains tax and VAT and introduce a master file reporting requirement in line with BEPS action 13.



Peru

Rules on PEs, interest expense deductibility, indirect transfers revised

A new definition of permanent establishment is introduced, and the limits on interest expense deductions are extended to debt from unrelated parties, among other changes.



Peru

Suspension of general anti-avoidance rule lifted

In addition to modifying the GAAR, which had been suspended since 2014, the decree introduces joint liability for legal representatives and obligations for boards of directors.



United States

House bill addresses sales tax collection post-Wayfair

Draft legislation aims to address issues around the collection of state sales and use tax on "remote" sales transactions in the wake of the Supreme Court's *Wayfair* decision.

Tax treaty round up

Tax treaty developments in Bulgaria, China, Ecuador, Estonia, Hong Kong, Japan, Latvia, Lithuania, Russia, Saudi Arabia, Singapore, Spain, Switzerland and Vietnam.

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Have a question?

If you have any questions about the content in *World Tax Advisor*, please email Susan Lyons at slyons@deloitte.com or Sally Clurman at sclurman@deloitte.com.

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