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1 May 2023

Americas Tax Roundup

Latest news – Americas

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[Chilean government introduces amendments to the Mining Royalty bill](#)

On 11 April 2023, the Chilean government introduced amendments to the Mining Royalty bill (Bulletin No. 12093-08), currently under discussion in the Senate. The amendments would maintain the obligation to report financial statements to the Financial Market Commission, allow start-up and operation expenses to be amortized over six years and cap the maximum taxation applicable to mining royalty taxpayers at 48%.

[Chilean appeals court considers whether Chile can tax Spanish resident's indirect transfer of Chilean company](#)

A Chilean Court of Appeals ruled that, under the terms of the double tax treaty between Chile and Spain, Chile is not allowed to impose tax on a Spanish resident who indirectly transferred a Chilean company. The court rejected the tax authority's argument that Chile may tax both direct and indirect transfers under the treaty.

[Brazil implements new visa-free policy for seafarers](#)

Effective 1 May, crew members of international (i.e., non-Brazilian) vessels will no longer be allowed to enter Brazil using a Seafarers' Identity Document issued pursuant to Convention 108 of the International Labour Organization (SID C-108). They will only be allowed to enter using a SID issued pursuant to Convention 185 (SID C-185). SID C-185 holders will be able to enter Brazil without a visa for up to (i) 90 days in a migratory year (starting from the date of their first entry) when working on non-Brazilian maritime support ships and/or platforms; and (ii) 180 days in a migratory year (starting from the date of their first entry) when working on non-Brazilian long-trip ships and/or cruises.

This week's tax treaty news in the Americas

- ▶ Brazil and Portugal: interest in swift conclusion of amending protocol to tax treaty expressed
- ▶ Brazil and Spain: interest in revising income tax treaty expressed
- ▶ United States and Norway: negotiations ongoing for a new tax treaty

Upcoming webcasts

[EY Tax.Tech™ Ecosystem series: OECD Pillar Two global minimum tax requirements \(4 May\)](#)

In this webcast, panelists from EY, Orbitax and Thomson Reuters discuss the data requirements, processing steps and timeline necessary to meet upcoming BEPS 2.0 Pillar Two requirements.



[The current environment for US R&D credit claims: A review of the latest guidance \(17 May\)](#)

Recent court decisions underscore the growing importance of detailed, comprehensive documentation in sustaining an R&D credit claim. This webcast is relevant to taxpayers with original and amended US return R&D credit claims, taxpayers under examination and taxpayers contemplating R&D credit claims in the future. Understanding the current judicial, examination and Appeals environment will help taxpayers anticipate what will be required to sustain an R&D credit.

[Tax in a time of transition: US legislative, economic, regulatory and IRS developments \(19 May\)](#)

Please join us for a fast-paced overview of recent US tax and economic developments designed to help you stay on top of changes in today's shifting economic, legislative and regulatory environment. In this regularly occurring webcast series, panelists will provide updates on: (i) the US economy and tax policy; (ii) what's happening at the IRS; and (iii) breaking developments.

[Private equity and private capital quarterly tax webcast \(8 June\)](#)

Please join our panel of professionals for our webcast – a timely discussion of recent global private equity (PE) industry trends and the outlook for changes relevant to PE and alternative funds, transactions, fund professionals, and portfolio companies.

For a full list of upcoming webcasts, please access EY's webcast page on ey.com [here](#).

Recently archived webcasts

[Tax in a time of transition: legislative, economic, regulatory and IRS developments](#)

In this webcast, panelists discussed the US economy and tax policy, what's happening at the IRS and breaking developments.

Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 28 April 2023](#)

EY's weekly US Cross-Border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include:

- ▶ US House passes debt ceiling, spending bill
- ▶ Treasury says no decision on interim CAMT guidance
- ▶ IRS updates crypto notice
- ▶ OECD to release BEPS Pillar Two qualified domestic minimum top-up tax safe harbor by summer

You can register for this weekly podcast on Apple Podcasts [here](#).

This week's EY Global Tax Alerts

Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments – 28 April 2023](#)
- ▶ [Chilean government introduces amendments to the Mining Royalty bill](#)
- ▶ [Chilean appeals court considers whether Chile can tax Spanish resident's indirect transfer of Chilean company](#)



Other Global Tax Alerts

- ▶ Ghana: Tax treatment and the recognition of deferred tax on Expected Credit Losses
- ▶ Ghana's new laws introduce new taxes affecting individuals and businesses
- ▶ Luxembourg provides details on new draft transfer pricing provisions

Human Capital Alerts

- ▶ Brazil implements new visa-free policy for seafarers
- ▶ Mainland China relaxes pre-travel COVID-19 testing requirements for all inbound travelers
- ▶ Czech Republic's Chamber of Deputies approves significant amendments to existing immigration laws

EY Industry and Tax Services publications

Industry

Energy / Government & Public Sector

- ▶ Why wavering consumer confidence could stall the energy transition

Financial Services

- ▶ Where can wealth managers find opportunity when assets are in flux?
- ▶ How can today's millennial investors drive tomorrow's business growth?

Private Equity

- ▶ Private Equity Pulse: takeaways from 1Q 2023

Services

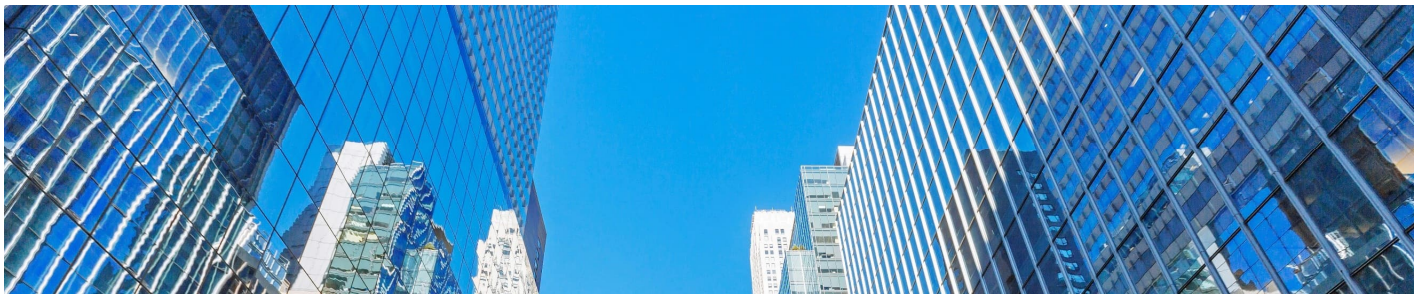
Tax

- ▶ How tax accounting teams should prepare for BEPS changes

Comments

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