

Americas Tax Roundup

Latest news - Americas

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US President Biden signs Fiscal Responsibility Act

US President Biden signed the *Fiscal Responsibility Act* (HR 3746) on 3 June 2023, which suspends the statutory debt ceiling through 1 January 2025, and includes curbs on federal spending for two years as well as clawbacks of Internal Revenue Service and COVID-related funding. The US Senate cleared the bill for President Biden's signature on 1 June 2023, after the US House of Representatives passed the bill on 31 May 2023.

Brazil adopts new rule on individual taxation of financial investments, controlled entities and trusts held abroad

Brazil recently published Provisional Measure 1,171/23 (PM 1,171), which amends certain tax provisions dealing with Brazilian individual taxation on financial investments, controlled entities and trusts held abroad. It also updates the monthly progressive tax rates applicable to individuals.

Dominican Republic Executive Branch enacts law implementing mandatory electronic invoicing

The President of the Dominican Republic enacted a new electronic invoicing (EI) law regulating the mandatory use of the EI. The EI law establishes the EI tax system, including its characteristics and deadlines.

Canada | Prince Edward Island budget 2023-24

On 25 May 2023, Prince Edward Island's new Finance Minister, Jill Burridge, tabled the province's fiscal 2023-24 budget. The budget contains several tax measures affecting individuals. The minister anticipates a deficit of \$66.2m for 2022-23 and projects a deficit of \$97.6m for 2023-24, followed by further reduced deficits for each of the next two fiscal years.

EY Canada's TaxMatters@EY for June 2023

The latest edition of TaxMatters@EY is available. Highlights of this month's edition include (i) commuting reimbursements and allowances in the remote working era; (ii) the Ontario-made manufacturing investment tax credit – new measure for eligible Canadian-controlled private corporations; and (iii) a Tax Court of Canada ruling that a tenant was liable for withholding tax on rents paid to landlord he did not know was nonresident.

This week's tax treaty news in the Americas

- Curação and Iceland: air services agreement entered into force
- United States and Chinese Taipei: resolution to address double taxation introduced



Upcoming webcasts

BEPS 2.0: Pillar Two implementation and practical considerations (7 June)

This webcast will examine the latest BEPS 2.0 Pillar Two implementation activity in countries around the world and highlight practical considerations with respect to the Pillar Two rules and guidance issued to date by the Inclusive Framework.

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.

Tax and Law Sustainability Update: How to navigate the changing landscape (13 June)

In this webcast, we explore topics including the relationship between sustainability and transfer pricing, legal implications of green marketing claims and interaction between tax and ESG.

How to understand the new class of tax authority governance programs in Americas and EMEIA (14 June) In this webcast for Americas and EMEIA audiences, EY professionals will describe the rapidly growing focus of business and tax authorities on tax governance.

Tax in a time of transition: US legislative, economic, regulatory and IRS developments (16 June)

Please join 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.

Finance and treasury: How to navigate the changing global tax landscape (28 June)

During this 60-minute webcast, EY professionals will discuss topics that will affect global finance and treasury activities including (i) tax issues and considerations to help navigate the current market-driven dynamics and high interest rate environment; (ii) transfer pricing trends related to financial transactions; and (iii) intercompany financing in light of Pillar Two.

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

Recently issued EY podcasts

US Cross-Border Taxation weekly podcast, 2 June 2023

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

- US Congress passes debt ceiling legislation
- US House Ways and Means Committee Republicans introduce legislation targeting OECD BEPS 2.0 Pillar Two Undertaxed Profits Rule
- US Senate Foreign Relations Committee reports out proposed US-Chile income tax treaty
- US House members introduce resolution calling for legislation to prevent US-Taiwan double taxation

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 2 June 2023
- Brazil adopts new rule on individual taxation of financial investments, controlled entities and trusts held abroad
- Canada | Prince Edward Island budget 2023-24
- Dominican Republic Executive Branch enacts law implementing mandatory electronic invoicing
- US IRS officials highlight latest transfer pricing developments
- ▶ US Senate committee approves tax convention with Chile; vote by full Senate is next

Other Global Tax Alerts

- Denmark expands tax liability scope to include activities carried out in the Exclusive Economic Zone
- Luxembourg enacts tax transparency rules for digital platforms, makes other changes regarding administrative cooperation in tax matters
- ► The Netherlands issues proposed Pillar Two legislation
- Saudi Arabia announces fifth wave of Phase 2 e-invoicing integration
- Saudi Arabia clarifies interpretation of service-PE provisions in its tax treaties
- Turkey extends the deadline for tax amnesty application

Human Capital Alerts

- UAE issues update to the mandatory unemployment insurance program
- UK announces changes to the Youth Mobility Scheme

Indirect Tax Alerts

- German Federal Administrative Court confirms legality of local packaging tax in city of Tübingen
- UK/Australia and New Zealand Free Trade Agreements enter into force

EY Industry and Tax Services publications

Industry

Financial Services

- How banks are staking a claim in the embedded finance ecosystem
- ► How the right conversations can empower finance transformation strategies

Energy

How workforce sustainability will transform the energy industry

Services

Tax

Case study: how tech and trust transformed a tax operating model



Comments

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