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4 March 2024

# Americas Tax Roundup

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## Latest news – Americas

### [Peru's Tax Court confirms withholding on deemed dividends Peruvian branches pay to Andean Community parent](#)

The Peruvian Tax Court recently confirmed, in Resolution 02171-12-2023, that Peruvian branches of an entity that is resident in an Andean Community member country are considered Peru-resident entities. Further, the court held that the deemed dividends distributed to the branch's parent entity should be subject to withholding exclusively in Peru under Article 11 of Decision 578, a Multilateral Agreement to Avoid Double Taxation in the Andean Community (Peru, Ecuador, Colombia and Bolivia).

### [US IRS delays Form 1042 electronic filing requirement for US and foreign withholding agents](#)

In [Notice 2024-26](#) (issued 27 February 2024), the IRS exempted US and foreign withholding agents from electronically filing Form 1042, *Annual Withholding Tax Return for U.S. Source Income of Foreign Persons*, for calendar year 2024.

### [Canada | British Columbia budget 2024-25 includes several measures affecting businesses](#)

On 22 February 2024, British Columbia Finance Minister Katrine Conroy tabled the province's fiscal 2024-25 budget. The budget contains several tax measures affecting corporations and individuals, including the introduction of a new home-flipping tax. The minister anticipates a deficit of CA\$7.9 billion for 2024-25 and projects deficits for each of the next two years.

### [Canada | Nunavut budget 2024-25 tabled](#)

On 26 February 2024, Nunavut Finance Minister Lorne Kusugak tabled the territory's fiscal 2024-25 budget. The budget contains no new taxes and no income tax increases. The minister anticipates an operating deficit of CA\$14.6m for 2023-24 and projects an operating deficit of CA\$21.0m for 2024-25.

### [TradeFlash | February 2024](#)

This issue provides links to numerous EY articles, webcasts and podcasts covering key trade topics, such as the treatment of royalties, sustainable trade, the impact of supply chain disruption on trade compliance, trade technology and UK free trade agreements. This newsletter is a companion to EY's *TradeWatch*, our interactive trade magazine that provides insights on customs and trade matters worldwide.

### [Introducing EY talks tax | A new podcast series based on EY Tax webcasts](#)

For those who like to learn about recent tax developments while on the go, there is now a new option. Tune into *EY talks tax*, a recently launched podcast series based on EY Tax webcasts. In the series, EY subject-matter professionals share insights on a wide range of tax topics, from US federal to international and state and local tax issues. The series will also cover major OECD BEPS 2.0 developments. You can find, follow or download *EY talks tax* on [Apple Podcasts](#), [Spotify](#), or wherever you prefer to access your favorite podcasts. Episodes in the series originally aired as EY Tax webcasts, and the original webcasts and archived versions can be accessed at [Webcasts | EY - US](#).



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## This week's tax treaty news in the Americas

- ▶ [Brazil and Czech Republic: social security agreement approved by Brazilian Chamber of Deputies](#)
- ▶ [Guatemala and Spain: interest in signing tax treaty expressed](#)
- ▶ [Uruguay and Australia: negotiations for social security agreement commenced](#)

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## Upcoming webcasts

### [BEPS 2.0 Pillar One update: Amount B implications \(7 March\)](#)

In this webcast, panelists will discuss the latest release by the OECD regarding BEPS Pillar One Amount B on baseline distribution activities and the implications for companies.

### [The US Inflation Reduction Act: monetization benefits for companies across all sectors \(12 March\)](#)

The US Inflation Reduction Act of 2022 (IRA) contained \$369 billion in climate and energy-related provisions designed to (1) incentivize and accelerate the buildout of renewable energy, (2) accelerate the adoption of electric vehicle (EV) technologies and (3) improve the energy efficiency of buildings and communities. Now that Treasury and the IRS have issued guidance on almost all of the IRA's provisions, companies across all sectors will want to take another look at the law's provisions to enhance investment with credit transferability and monetization. Please join EY's tax professionals to gain perspective on the key tax considerations and forecasting required to determine how to capture credit value and monitor compliance.

### [Spotlight on BEPS 2.0: Developments and practical implications for US MNEs \(13 March\)](#)

Please join Pillar Two subject-matter professionals for an action-oriented panel discussion, moderated by EY's Jose Murillo, National Tax Department Leader and former US Department of the Treasury Deputy Assistant Secretary (International Tax Affairs). Topics to be covered include: (i) recent BEPS 2.0 activity around the globe; (ii) practical considerations for the upcoming Q1 tax provision; and (iii) Amount B overview.

### [Unpacking the latest European packaging regulatory and tax developments \(14 March\)](#)

Join this 60-minute webcast to unpack the proposal for the revised Packaging and Packaging Waste Directive and its potential impact on extended producer responsibility. The webcast will discuss the latest legislative developments across Europe (e.g., a new plastic packaging tax will be introduced by Italy (1 July 2024) and Germany (1 January 2025) to pay for the EU Plastics Levy).

### [Economic impact of AI: the dawn of a new economic paradigm? \(19 March\)](#)

During this webcast, our panelists will discuss (i) how GenAI will affect the global economy and how quickly the impact could be felt; (ii) economic opportunities and risks presented by GenAI; and (iii) actionable insights tailored for business leaders, boards of directors, policymakers and other influential stakeholders.

### [Tax in a time of transition: US legislative, economic, regulatory and IRS developments \(22 March\)](#)

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.



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## Recently issued EY podcasts

[EY Podcast: weekly US international cross-border taxation news for week ending 1 March 2024](#)

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments.

Highlights this week include:

- ▶ US IRS exempts Form 1042 electronic filing in 2024 for US and nonresident withholding agents
- ▶ IRS will no longer issue significant single issue PLRs
- ▶ US Senate approves nomination of new IRS Chief Counsel
- ▶ EY launches new tax podcast series

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

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## This week's EY Global Tax Alerts

### Americas Tax Alerts

- ▶ [Report on recent US international tax developments – 1 March 2024](#)
- ▶ [Canada | British Columbia budget 2024-25 includes several measures affecting businesses](#)
- ▶ [Canada | Nunavut budget 2024-25 tabled](#)
- ▶ [US IRS delays Form 1042 electronic filing requirement for US and foreign withholding agents](#)

### Other Global Tax Alerts

- ▶ [Australian Tax Office issues Taxpayer Alert on R&D activities conducted overseas for foreign related entities](#)
- ▶ [Bahrain implements new end-of-service benefit system from 1 March 2024](#)
- ▶ [South Africa announces sustainability and energy tax measures as part of 2024 Budget Review](#)

### Human Capital Alerts

- ▶ [Bahrain suspends conversion of visitor visas to work visas or dependent visas without a sponsor](#)
- ▶ [Bulgaria extends temporary protection for Ukrainian nationals and residents until March 2025](#)
- ▶ [Denmark announces new mobility and migration agreement with India](#)
- ▶ [France releases new guidance regarding employer tax due for companies that hire or host foreign nationals](#)
- ▶ [Netherlands implements bill curtailing 30% facility](#)
- ▶ [New Zealand's immigration policy under the first 100 days of a new government discussed](#)

### Indirect Tax Alerts

- ▶ [Bulgaria progressing on SAF-T implementation](#)
- ▶ [European Union | First vote on EU customs reform](#)
- ▶ [New Zealand | Reminder for online marketplace operators; GST changes effective from 1 April 2024](#)

### Transfer Pricing Tax Alerts

- ▶ [Swiss Federal Tax Authorities release practical Q&A guidance on applying transfer pricing rules](#)



## EY Industry and Tax Services publications

### Services

#### Tax

- ▶ [How to find certainty amid tax policy transformation](#)

### Issues

#### Growth

- ▶ [How tech disruptions can inform the economic impact of AI](#)

### Comments

If you have any questions or suggestions about this newsletter, please email Global Tax News Update Help at: [globaltaxnewsupdatehelp@ey.com](mailto:globaltaxnewsupdatehelp@ey.com).

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