



Building a better  
working world

5 February 2024

# Americas Tax Roundup

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## Latest news – Americas

### [OECD publishes ICAP statistics](#)

On 29 January 2024, the OECD released the first-published [statistics on the International Compliance Assurance Program \(ICAP\)](#) since its start in 2018, covering all 20 cases completed by October 2023. The statistics provide information on the tax administrations that participated in the completed ICAP risk assessments, the average time taken to complete a risk assessment, the core risk areas covered and aggregated data on the risk assessment outcomes. The document also includes information on the relationship between ICAP and other routes to tax certainty, such as advance pricing arrangements and mutual agreement procedures.

### [Uruguayan Government extends period to invest in large economic projects](#)

Uruguay issued an Executive Office Decree No. 23/024, modifying the “large economic dimension projects” promotional regime to allow investment projects carried out within 72 (previously 48) months of the date that Decree No. 138/020 entered into force to qualify for the regime. The projects must be presented before 1 January 2025 and the investment must be executed before 1 October 2027.

### [USCIS announces strengthened integrity measures for H-1B program](#)

On 30 January 2024, US Citizenship and Immigration Services (USCIS) announced a final rule intended to strengthen the integrity of and safeguard against fraud in the H-1B annual cap registration process. The final rule establishes a beneficiary-centric selection process for registrations submitted by employers, provides start date flexibility for certain petitions, and aims to ensure the integrity of the registration process.

### [Argentina implements new immigration requirements for intra-company transfer residence permits](#)

The Argentine authorities recently implemented new requirements for holders of intra-company transfer residence permits. The immigration authorities are now requesting copies of “Alta temprana” (tax) notifications from foreign nationals in support of their initial applications for temporary residence as intra-company transferees under Article 23E of Law 25.871.

### [Panama extends deadline for permit extensions until 31 March 2024](#)

On 13 January 2024, the Panamanian government announced that foreign nationals who hold an expired residence permit can file an extension application until 31 March 2024. Foreign nationals whose residence permits expired on or after 13 March 2020 can submit an extension request until 29 February 2024.

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

- ▶ Canada and Moldova: negotiations for social security agreement are underway
- ▶ United States and Taiwan: Taiwan double tax relief legislation sent to US Senate



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## Upcoming webcasts

### [How to drive value beyond ESG reporting \(6 February\)](#)

The EY team will be hosting a webcast on how to prepare for the next steps of your sustainability transformation and generate value beyond ESG internal/external reporting. Primarily, the webcast is targeted towards the CFO community, but it also addresses the wider C-suite.

### [International tax talk quarterly series with the EY Global Tax Desk Network \(13 February\)](#)

In this webcast, panelists discuss developments affecting cross-border intercompany cash repatriation and financing.

### [Sustainability Tax webcast series: Navigating the landscape of tax transparency \(21 February\)](#)

Please join panelists from EY's Sustainability Tax practice and The Proctor & Gamble Company for the next installment in our quarterly series of webcasts discussing the role of tax in sustainability as we discuss tax transparency -- what it means, how to think about it and how to effectively navigate it inside and outside your organizations.

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## Recently issued EY podcasts

### [EY Podcast: weekly US international cross-border taxation news for week ending 2 February 2024](#)

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

- ▶ US House of Representatives passes tax package; Senate action unclear
- ▶ IRS expects to finalize two sets of Section 367 proposed regulations in first half of 2024
- ▶ Senate Finance Committee again approves IRS Chief Counsel nomination
- ▶ OECD releases first statistics on ICAP

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 - 2 February 2024](#)
- ▶ [OECD publishes ICAP statistics](#)
- ▶ [Uruguayan Government extends period to invest in large economic projects](#)

### Other Global Tax Alerts

- ▶ [Australian Tax Office issues updated draft taxation ruling TR 2024/D1 on software royalties](#)
- ▶ [India's 2024/25 interim budget proposals impact individual taxpayers](#)
- ▶ [Kenya makes several changes to employment-related contributions](#)

### Human Capital Alerts

- ▶ [Argentina implements new immigration requirements for intra-company transfer residence permits](#)
- ▶ [China's new visa exemption for Singapore nationals effective 9 February 2024](#)
- ▶ [Finland to extend residence permits issued on the basis of temporary protection until 4 March 2025](#)
- ▶ [France's increase in minimum wage impacts requirements for multiple immigration permits](#)



- ▶ Italy approves significant changes to special tax regime for inbound workers moving to Italy
- ▶ Kosovo's new visa exemption for nationals of the United Arab Emirates discussed
- ▶ Malta launches new fast-track immigration pathway for highly skilled third-country nationals
- ▶ Netherlands publishes new 60-days decree for inter-company secondments
- ▶ Panama extends deadline for permit extensions until 31 March 2024
- ▶ Singapore announces visa exemption for Mainland Chinese nationals and updates to work pass requirements
- ▶ UK announces changes to business visitor rules effective 31 January 2024
- ▶ UK announces timelines for its five-point immigration plan
- ▶ USCIS announces strengthened integrity measures for H-1B program

#### Indirect Tax Alerts

- ▶ Pakistan taxpayers required to issue electronic invoices for fast-moving consumer goods must request extensions until government approves software providers

#### Transfer Pricing Alerts

- ▶ Cyprus tax authorities issue revised thresholds for transfer pricing documentation

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## EY Industry and Tax Services publications

### Services

#### Transactions Advisory Services

- ▶ [Geostrategic Analysis: February 2024 edition](#)

### Issues

#### Growth

- ▶ [Podcast: Why CFO communication is important in driving organizational change](#)

### 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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