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9 November 2020

# Americas Tax Roundup

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## Latest news – Americas

### [COVID-19 relief measures continue throughout Americas](#)

*Jurisdictions throughout the region continue to announce new and expanded measures to respond to the COVID-19 pandemic.*

### [US Election 2020 | Key alerts and other resources from EY Tax](#)

*To help taxpayers plan for the implications of the US election, EY offers new and regularly updated resources, including Tax Alerts, upcoming webcasts, articles and other analyses.*

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### [Mexico: initial reporting due date for MDR obligations is fast approaching](#)

Taxpayers will have to disclose reportable transactions in early 2021 under the mandatory disclosure regime (MDR) enacted as part of the Mexican tax reform that went into effect on 1 January 2020. The MDR requires taxpayers to review transactions conducted before and during 2020 to determine whether those transactions must be reported. With the first reports for reportable transactions due on or before 15 February 2021, taxpayers should be reviewing their transactions and determining whether they are obligated to report.

### [Chile's IRS establishes new transfer pricing documentation requirements](#)

The Chilean Internal Revenue Service has published a resolution establishing new Transfer Pricing Informative Sworn Statements No. 1950 (Annual Master File Affidavit) and No. 1951 (Annual Local File Affidavit). With the new affidavits, Chile is aligned with the reporting obligations recommended in OECD international guidelines for transfer pricing and BEPS Action 13. The new affidavits require the submission of a large volume of information. Taxpayers should consider the effect the new affidavit requirements will have on their operations.

### [OECD releases economic impact analysis of BEPS 2.0 project proposals](#)

The OECD Secretariat has released an economic impact assessment report on the international tax changes being developed in the BEPS 2.0 project. The report focuses primarily on the impact of the proposals on tax revenues, multinational entity investment, and economic activity. The report does not include jurisdiction-specific estimates. Overall, the report suggests that a consensus-based multilateral solution involving BEPS 2.0 Pillar One and Pillar Two would result in tax revenue gains to most jurisdictions, except for investment hubs.

### [OECD releases new methodology for peer reviews of BEPS Action 13 on Country-by-Country Reporting](#)

The OECD has released an updated version of the peer review documents related to the BEPS Action 13 minimum standard on Country-by-Country Reporting (CbCR), including a revised methodology. The purpose of the peer reviews is to ensure the consistent and effective implementation of the CbCR minimum standard. The revised methodology, which sets out the procedural mechanism by which jurisdictions will complete the peer reviews from 2020 onwards, replaces the one agreed by the Inclusive Framework on BEPS in 2017.



### [OECD releases report on taxing virtual currencies](#)

The OECD/G20 Inclusive Framework (IF) on BEPS has released a report on taxing virtual currencies that provides a cross-jurisdictional overview of the tax treatment and emerging tax policy issues in relation to these currencies. The report is the first formal report from the OECD and IF that is specific to taxing virtual currencies and the related emerging tax policy issues. It is an important first step towards more clarity and guidance on several issues related to virtual currencies where policymakers currently face challenges.

### [Canada Revenue Agency provides updates on CEWS and employee benefits](#)

During a CPA Canada webinar held on 26 October, the Canada Revenue Agency (CRA) provided updates on certain aspects of the Canada Emergency Wage Subsidy (CEWS), particularly with respect to CEWS audits. The CRA also introduced several administrative positions it is adopting relating to employment benefits.

### [EY Canada releases latest issue of \*TaxMatters@EY\*](#)

*TaxMatters@EY*, a monthly bulletin prepared by EY Canada, provides a summary of recent Canadian tax news, publications, and resources. Highlights of the November 2020 issue include: (1) the details of Bill C-4 on transitional measures from the Canada Emergency Response Benefit, (2) considerations related to the CRA beginning to issue audit request letters to employers that applied for the Canada Emergency Wage Subsidy, and (3) the excluded business exception under the updated tax on split income rules.

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

- ▶ Ecuador and European Free Trade Association (Iceland, Liechtenstein, Norway, and Switzerland): free trade agreement entered into force on 1 November 2020
- ▶ US and Croatia: tax treaty negotiations started

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## Upcoming webcasts

### [How the US general election impacts the global corporate tax outlook \(12 November\)](#)

The results of the US election will have a far-reaching effect on the global economy, the approach to business recovery, and potential changes in global tax policy. On this webcast, EY Global Vice Chair of Tax Kate Barton and tax leaders from some of the world's largest multinationals will discuss how to prepare for the impact of the election from a tax perspective.

### [Key tax, regulatory, and global trade implications as a result of the US general election outcome \(18 November\)](#)

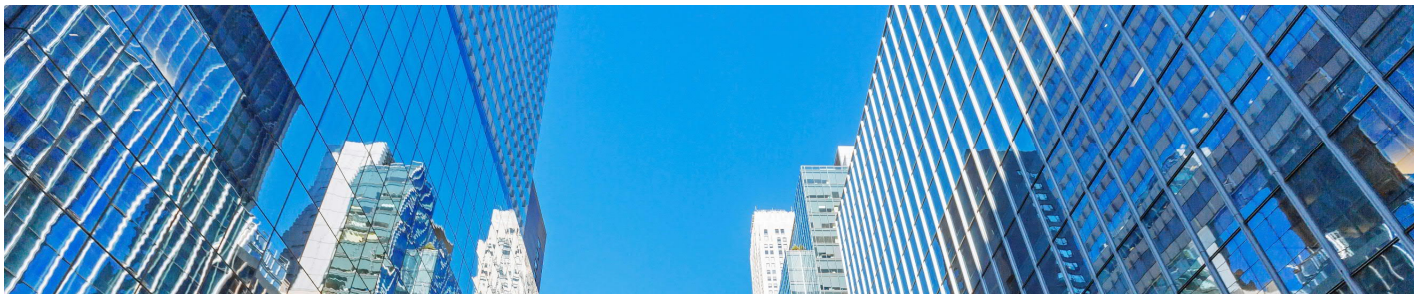
On this webcast, our panel will discuss what the outcome of the US general election means regarding US tax and trade policies and the impacts for inbound investors. The panel will also review recent Treasury regulation packages of relevance to inbound investors and recent US responses to global trade, including tariffs and digital taxes.

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## Recently issued EY podcasts

### [US Cross-Border Taxation weekly podcast, 6 November 2020](#)

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include: US elections remain undecided; IRS will not release PTEP proposed regulations by year-end; OECD releases report on taxing virtual currencies.



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## This week's EY Global Tax Alerts

### COVID-19 | Key Alerts and other resources from EY's Global Tax

Global Tax Alerts were issued this week with updated COVID-19 news, covering the following jurisdictions: Canada  
Access the Alerts and other COVID-19 related materials [here](#).

### Additional Global Tax Alerts

- ▶ [Report on recent US international tax developments – 6 November 2020](#)
- ▶ [Mexico's initial reporting due date for MDR obligations is fast approaching](#)
- ▶ [Canada Revenue Agency provides update on CEWS and employee benefits](#)
- ▶ [German Ministry of Finance publishes guidance on German taxation of extraterritorial intellectual property](#)
- ▶ [Poland and the Netherlands sign protocol to revise tax treaty](#)
- ▶ [Cyprus: Anticipated tax measures to be implemented including adoption of withholding taxes on payments made to EU non-cooperative jurisdictions](#)
- ▶ [India releases implementation rules for Equalization Levy on e-commerce supply and services](#)

### OECD Alerts

- ▶ [OECD releases report on taxing virtual currencies](#)
- ▶ [OECD releases economic impact analysis of BEPS 2.0 project proposals](#)
- ▶ [OECD releases new methodology for peer reviews of BEPS Action 13 on Country-by-Country Reporting](#)

### Transfer Pricing Alerts

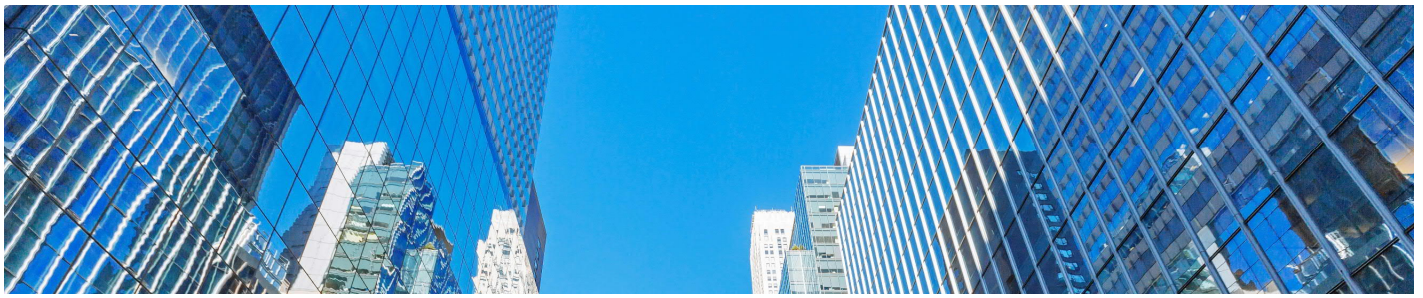
- ▶ [Chile's IRS establishes new transfer pricing documentation requirements](#)
- ▶ [Ghana publishes Transfer Pricing Regulations 2020](#)

### Human Capital Alerts

- ▶ [Approval process updated for entry of business travelers into Israel](#)
- ▶ [Post Brexit UK-Switzerland immigration perspective provided](#)

### Indirect Alerts

- ▶ [Kenya's Tax Appeals Tribunal rules VAT is applicable on sale of commercial property, loan-related fees are not subject to excise duty](#)
- ▶ [Japan and UK sign Comprehensive Economic Partnership Agreement](#)



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## EY Industry and Tax Services publications

### Industries

#### Automotive

- ▶ [Podcast: How mobility companies seek ways to stay relevant amid disruption](#)

#### Banking & Capital Markets

- ▶ [Why payments providers should modernize their payments infrastructure](#)

#### Consumer Products & Retail

- ▶ [How to use real-time data to mine better insights](#)

#### Insurance

- ▶ [How insurers can carry forward three silver linings of COVID-19](#)

#### Health and Life Sciences

- ▶ [How life sciences CEOs can rewire strategic planning and execution](#)

#### Private equity

- ▶ [Does accelerating adaptation present obstacles – or increase opportunities?](#)

#### Technology

- ▶ [How to harness the power of trust and data](#)

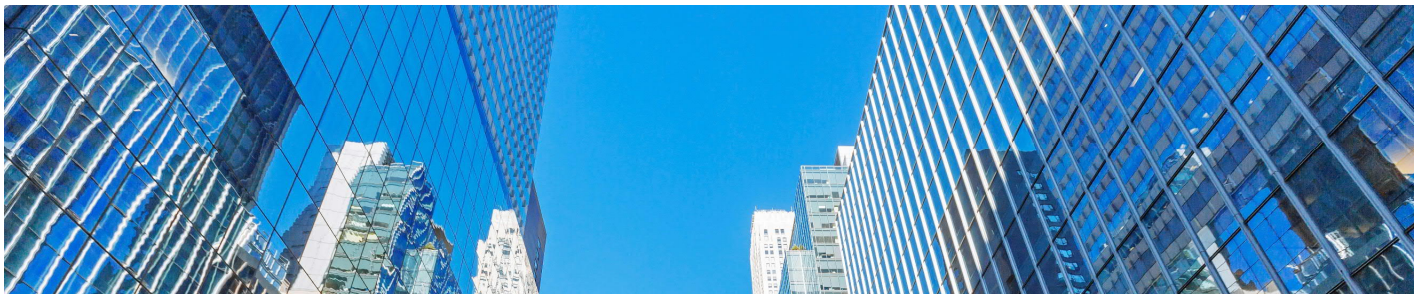
### Services

#### Tax

- ▶ [How Biden's declared victory will affect tax and trade globally](#)
- ▶ [How to put your indirect tax in motion to rise above uncertainty](#)

### 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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