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# 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.*

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### [Argentina implements mandatory disclosure rules](#)

The Argentine Federal Tax Authorities (AFIP) have established a mandatory reporting regime for domestic and international arrangements (*planificaciones fiscales*) implemented since 1 January 2019 or implemented before that date but with effects that subsist as of 20 October 2020. Taxpayers and tax advisors in Argentina should carefully review transactions conducted in 2020 and in prior years to determine whether any of the transactions give rise to a reporting obligation.

### [Uruguay's tax authorities expand corporate income tax benefits for software providers](#)

Uruguay's tax authorities have issued a resolution expanding the corporate income tax exemption for income from software development services. Under the expanded exemption, subject to certain requirements, 30% of the direct costs and expenses incurred outside Uruguay may be treated as incurred in Uruguay. This benefit applies only to tax years beginning from 1 January 2020 to 31 December 2020.

### [Uruguayan tax authority extends estimated tax payment deadlines due to COVID-19](#)

The Uruguayan tax authority has extended to December 2020 the deadline for making estimated tax payments of corporate income tax, net wealth tax, and corporation control tax that were previously due in October 2020. The extended deadline applies to entities classified by the tax authority as small or medium-sized with gross income from the previous fiscal year below a certain threshold.

### [US Trade Representative responds to WTO authorization for EU countermeasures on US goods, and EU delays countermeasures pending negotiations](#)

The World Trade Organization (WTO) recently authorized the European Union (EU) to impose countermeasures on US-origin products due to illegal US subsidies granted to a US aircraft manufacturer. The US Trade Representative (USTR) promptly responded to the announcement, stating that the US firmly disagrees with the finding and that any action taken by the EU will generate a response by the US. The EU has decided to wait for the outcome of the negotiations with the US before moving forward with countermeasures.



[BEPS 2.0 Pillar One Blueprint](#) and [Pillar Two Blueprint](#) – detailed EY Alerts now available

The OECD [recently released](#) a series of major documents in connection with the ongoing G20/OECD project titled “Addressing the Tax Challenges of the Digitalisation of the Economy” (BEPS 2.0). These documents include the long-awaited reports on the Pillar One Blueprint and Pillar Two Blueprint. Pillar One is directed at a global agreement on changing the allocation of taxing rights on business profits in a way that expands the taxing rights of market jurisdictions. Pillar Two addresses the development of global minimum tax rules with the objective of ensuring that global business income is subject to at least an agreed minimum rate of tax.

[EY’s ‘Latest on BEPS and Beyond’ for October 2020](#)

EY’s *Latest on BEPS and Beyond* monthly newsletter reviews global and regional BEPS-related policy trends, as well as recent BEPS-driven developments in individual countries. Highlights of the October 2020 edition include: (1) Chile’s amended rules on reporting indirect transfers of Chilean entities and assets, (2) Colombian rules for taxpayers requesting access to initiate a Mutual Agreement Procedure, (3) the Mexican President’s economic proposal for 2021, (4) Peru’s postponing of the filing of the CbC reports for the 2019 reporting fiscal year for certain entities, and (5) the Panamanian National Assembly’s approval of the MLI.

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## Upcoming webcasts

[Taxation of the digitalized economy: What’s next \(28 October\)](#)

On this webcast, panelists will discuss the latest developments in the taxation of the digitalized economy. Topics include the interaction of BEPS 2.0 and country digital services taxes (DSTs), the US presidential election, and the likely next steps for the many stakeholders involved in this global debate.

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## Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 23 October 2020](#)

EY’s weekly US Cross-border Taxation podcast reviews the week’s US international tax-related developments. Highlights this week include: IRS confirms some modifications to debt instruments, other contracts to reflect LIBOR end will not result in deemed taxable exchange; IRS will consider amending existing APAs due to effects of COVID-19 pandemic; US government announces US-Hong Kong shipping agreement will terminate effective 1 January 2021.

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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: Ireland, Japan, Luxembourg, the OECD and Uruguay. Access the Alerts and other COVID-19 related materials [here](#).



## Additional Global Tax Alerts

- ▶ Report on recent US international tax developments – 23 October 2020
- ▶ Luxembourg Tax Authorities publish XML schema and User Guide on submitting MDR reports
- ▶ Egypt introduces unified tax procedures law
- ▶ Indian Court rules on interaction between tax treaty provisions and Indian dividend distribution tax
- ▶ Russian Supreme Court addresses withholding tax on lease payments and classification for tax treaty purposes
- ▶ Ireland issues Budget 2021
- ▶ Argentina implements mandatory disclosure rules
- ▶ Japan: Post COVID-19 tax audit trends
- ▶ Spanish Supreme Court confirms case law on limits to dynamic interpretation of tax treaties
- ▶ Uruguayan tax authority extends estimated tax payment deadlines due to COVID-19
- ▶ Luxembourg Draft Budget Law 2021: Tax measures affecting individuals
- ▶ US: Calendar year 2019 FBARs extended to 31 October
- ▶ Uruguay's tax authorities expand corporate income tax benefits for software providers
- ▶ US IRS confirms that some modifications to debt instruments and other contracts to reflect LIBOR discontinuation will not result in a deemed taxable exchange
- ▶ US: Additional final regulations provide foreign tax credit guidance

## OECD Alerts

- ▶ OECD releases BEPS 2.0 Pillar One Blueprint and invites public comments
- ▶ OECD releases BEPS 2.0 Pillar Two Blueprint and invites public comments
- ▶ The Latest on BEPS and Beyond | October 2020 edition

## Indirect Alerts

- ▶ Italy's Tax Authority rules reinsurance fees for Claims Handling Services are subject to VAT
- ▶ Czech Government proceeds with legislation on Digital Services Tax
- ▶ EU responds to WTO authorization to impose countermeasures on US products



## EY Industry and Tax Services publications

### Industries

#### Automotive

- ▶ [How new mobility brings about new risks for the automotive industry](#)

#### Consumer Products & Retail

- ▶ [How to capture the real e-commerce opportunity](#)

#### Government & Public Sector

- ▶ [Why AI and the public sector are a winning formula](#)

#### Health and Life Sciences

- ▶ [Video: How an 'accidental entrepreneur' is on a mission to change capitalism](#)

### 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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