



World Tax Advisor
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Belgium: Court favors legalistic interpretation of beneficial ownership in IRD implementation

The Court of First Instance of Brussels has ruled that the beneficiary requirement in the domestic implementation of the withholding tax exemption in the EU interest and royalties directive should be interpreted in a legalistic manner, and not in an economic manner as endorsed by the Court of Justice of the European Union. The tax authorities have appealed the decision.

URL: <https://www.taxathand.com/article/40335/Belgium/2025/Court-favors-legalistic-interpretation-of-beneficial-ownership-in-IRD-implementation>

Belgium: Deadline for applying for certificate for thematic investment deduction extended

A royal decree has been published regarding the one-time extension of the application period to obtain a certificate of entitlement to the increased “thematic investment deduction.” The extended deadline is 12 months after the closing of the taxable period or financial year. The deduction is intended for investments by companies undertaking a “green” transition and prioritizing sustainable investment.

URL: <https://www.taxathand.com/article/40265/Belgium/2025/Deadline-for-applying-for-certificate-for-thematic-investment-deduction-extended>

Bermuda: Consultation paper on proposed tax credits published

The government has released a consultation paper on the proposed Tax Credits Act 2025, which includes proposals for a tax credit for regulated insurers, a community development credit, and a utilities infrastructure credit. The proposed tax credits are intended to be qualified refundable tax credits for the purposes of the OECD Pillar Two model rules. The public consultation period will run through 25 September 2025.

URL: <https://www.taxathand.com/article/40334/Bermuda/2025/Consultation-paper-on-proposed-tax-credits-published>

France: Constitutional Court rules digital services tax is constitutional

The Constitutional Court has ruled that the 3% digital services tax is fully compatible with constitutional principles. The digital services tax is imposed on annual revenue derived from the online placement of advertising and the sale of collected user data, or from certain intermediation services, and applies only to companies of groups whose relevant turnover during the calendar year exceeds EUR 750 million globally and EUR 25 million in France.

URL: <https://www.taxathand.com/article/40349/France/2025/Constitutional-Court-rules-digital-services-tax-is-constitutional>

Germany: BFH rules loss carryforward may be used after partnership merger into limited partner

A decision from the federal tax court addresses a situation in which a limited partnership was left with only one partner and thus automatically merged into such partner. The partnership had a net operating loss carryforward that was attributable to the partner and that existed prior to the merger. Under the circumstances, the court ruled that the partnership's net operating loss carryforward could be used by the partner to offset its future profits for federal corporate income tax purposes.

URL: <https://www.taxathand.com/article/40340/Germany/2025/BFH-rules-loss-carryforward-may-be-used-after-partnership-merger-into-limited-partner>

Mexico: 2026 economic package submitted to Chamber of Deputies

The executive branch has submitted an economic package to the Chamber of Deputies for review, which contains a variety of tax proposals that are relevant to companies and individuals. If approved by Congress, the proposals will become effective as from 1 January 2026.

URL: <https://www.taxathand.com/article/40352/Mexico/2025/2026-economic-package-submitted-to-Chamber-of-Deputies>

Netherlands: Ministry of Finance publishes tax plan for 2026

The Ministry of Finance has published the government's tax plan for 2026. The plan includes several corporate income tax proposals that are relevant for international companies, as well as proposals to amend the Minimum Tax Act 2024 based on the latest administrative guidance from the OECD. The plan also includes a bill to implement the EU directive on the automatic exchange of top-up tax information returns between member states in relation to the minimum tax.

URL: <https://www.taxathand.com/article/40351/Netherlands/2025/Ministry-of-Finance-publishes-tax-plan-for-2026>

New Zealand: Tax bill proposes simplification

A tax bill has been introduced into parliament that aims to simplify compliance for certain taxpayers. The bill contains a broad range of measures, including provisions that are relevant to individuals, employees, and employers. The bill also contains certain administrative and remedial measures.

URL: <https://www.taxathand.com/article/40308/New-Zealand/2025/Tax-bill-promises-simplification>

Norway: Withholding tax and US RICs: A new era of treaty protection

This article discusses the competent authority arrangement with the US, which provides clarity that article 20 (denying certain treaty benefits to certain investment companies) of the Norway-US tax treaty does not apply to US companies that qualify as a “regulated investment company” under US law. The article also explains the legal framework and historical context for the arrangement.

URL: <https://www.taxathand.com/article/40328/Norway/2025/Withholding-tax-and-US-RICs-A-new-era-of-treaty-protection>

Paraguay: Law updates maquila regime

A law has been published in the official gazette that establishes new guidelines for the creation and regulation of maquila companies that, in whole or in part, perform maquila contracts with foreign entities; new tax exemptions have also been introduced.

URL: <https://www.taxathand.com/article/40342/Paraguay/2025/Law-updates-maquila-regime>

Paraguay: New tax incentives regime for domestic and foreign investment

A law has been published in the official gazette that establishes a new tax incentive regime for domestic and foreign investment, which includes customs duty exemptions, VAT exemptions, nonresident income tax exemptions, and dividend and profit tax exemptions.

URL: <https://www.taxathand.com/article/40321/Paraguay/2025/New-tax-incentives-regime-for-domestic-and-foreign-investment>

Taiwan (China): Foreign tax credit relief may only be claimed by those assuming the foreign tax

A press release has been issued that reminds profit-seeking enterprises that they may only claim foreign income tax credits when they actually bear the foreign tax burden. Contractual arrangements that shift the tax liability to counterparties will void this right.

URL: <https://www.taxathand.com/article/40315/Taiwan-China/2025/Foreign-tax-credit-relief-may-only-be-claimed-by-those-assuming-the-foreign-tax>

United Kingdom: Amendments to International Tax Compliance Regulations enter into force

Regulations have come into force regarding the implementation of the OECD’s amendments to the Common Reporting Standard, updates to the penalty provisions for noncompliance, and the introduction of a new mandatory registration requirement for UK reporting financial institutions and trustee-documented trusts in regard to the automatic exchange of information service.

URL: <https://www.taxathand.com/article/40266/United-Kingdom/2025/Amendments-to-International-Tax-Compliance-Regulations-enter-into-force>

United States: G7's Pillar Two shared understanding: Why 2024 compliance still demands action

Deloitte Tax LLP has published an article exploring what the G7 consensus on considering the US's tax regime in a "side-by-side" manner with the OECD Pillar Two global minimum tax rules may mean for US-parented multinational enterprises, and why organizations should continue to prioritize actions to meet their tax obligations.

URL: <https://www.taxathand.com/article/40271/United-States/2025/G7s-Pillar-Two-shared-understanding-Why-2024-compliance-still-demands-action>

Various jurisdictions: Global trade updates

Recent announcements and developments for various jurisdictions.

URL: <https://www.taxathand.com/search-results?page=1&tagIds=484>

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