



World Tax Advisor
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Australia: ATO releases first Pillar Two guidance—take “reasonable measures” to comply

The Australian Taxation Office has released draft administrative guidance on the new Pillar Two rules that sets out an approach to the enforcement of penalties during the transition period, which covers the first three years of operative effect of the Pillar Two rules in Australia starting from income years beginning from 1 January 2024. Comments on the draft guidance are due by 29 August 2025.

URL: <https://www.taxathand.com/article/39101/Australia/2025/ATO-releases-first-Pillar-Two-guidancetake-reasonable-measures-to-comply>

Belgium: Royal decree confirms PEPPOL network to be used for e-invoicing

A royal decree has been published that sets out the required standards for semantics, syntax, and the transmission method relevant to the introduction of mandatory e-invoicing in Belgium. The decree confirms the effective date of the e-invoicing mandate as 1 January 2026 and provides for a new penalty for failing to have the technical capability to comply with the mandate.

URL: <https://www.taxathand.com/article/39103/Belgium/2025/Royal-decree-confirms-PEPPOL-network-to-be-used-for-e-invoicing>

Costa Rica: Transition to new TRIBU-CR tax system is imminent

The tax authorities are replacing their current systems and platforms with a new integrated system, TRIBU-CR. Some existing systems will be shut down on 18 July 2025 and TRIBU-CR is expected to be launched on 4 August 2025. Taxpayers should consider taking certain actions to facilitate a smooth transition.

URL: <https://www.taxathand.com/article/39099/Costa-Rica/2025/Transition-to-new-TRIBU-CR-tax-system-is-imminent>

Denmark: Court rules that five-year statute of limitations applies to withholding tax claims

The Eastern High Court has rendered a judgment stating that the deadline for foreign taxpayers to file claims for repayment of Danish dividend and royalty withholding tax is five years. In practice, the tax authorities had been applying a three-year statute of limitations. Although the judgment concerns only dividend and royalty withholding tax, the same rules apply to interest withholding tax.

URL: <https://www.taxathand.com/article/39081/Denmark/2025/Court-rules-that-five-year-statute-of-limitation-applies-to-withholding-tax-claims>

European Union: Commission publishes 2025 eInvoicing Country Factsheets

The European Commission has published the 2025 edition of its eInvoicing Country Factsheets. The factsheets provide information on e-invoicing policies and practices in each of the 27 EU member states and the four European Economic Area member states, and include a dedicated section on B2B (business-to-business) e-invoicing legislation.

URL: <https://www.taxathand.com/article/39104/European-Union/2025/Commission-publishes-2025-eInvoicing-Country-Factsheets>

G7: Pillar Two: Statement on US “side-by-side” treatment

A G7 statement has been released that describes the framework for a “shared understanding” in relation to the interaction of Pillar Two and the US tax system. The framework is designed to preserve protections against base erosion and profit shifting and provide greater certainty and stability to the international tax system.

URL: <https://www.taxathand.com/article/39087/OECD/2025/Pillar-Two-G7-statement-on-US-side-by-side-treatment>

Germany: Upper house approves law to introduce tax incentives for investment boost

Both houses of parliament have now approved a law for an investment program that is intended to boost the economy and strengthen Germany as a business location. The main measures in the law include a declining balance depreciation method for certain movable fixed assets and a reduction of the federal corporate income tax rate by 1% annually during the five-year period from 2028 to 2032.

URL: <https://www.taxathand.com/article/39093/Germany/2025/Upper-house-approves-law-to-introduce-tax-incentives-for-investment-boost>

OECD: Tax Administration 3.0: From Vision to Strategy released

The OECD has released a report that presents recommendations regarding how tax authorities can benefit from digital transformation and make tax administration a less burdensome and more seamless process. The new report is in line with the vision set forth in the 2020 publication *Tax Administration 3.0: The Digital Transformation of Tax Administration*.

URL: <https://www.taxathand.com/article/39035/OECD/2025/Tax-Administration-3-0-From-Vision-to-Strategy-released>

United States: IRS revokes broker reporting rules

To implement a change that aligns with legislative actions already taken by Congress and the president, the Internal Revenue Service and the Treasury Department have announced that the final regulations titled “Gross Proceeds Reporting by Brokers that Regularly Provide Services Effectuating Digital Asset Sales” will be removed from the Code of Federal Regulations.

URL: <https://www.taxathand.com/article/39094/United-States/2025/IRS-revokes-broker-reporting-rules>

United States: US tax law impact on non-US headquartered multinational businesses

This article provides a high-level summary of the potential tax implications for non-US headquartered multinational businesses of recent US tax law changes commonly referred to as the “One Big Beautiful Bill Act.” What were once high-level proposals and talking points are now fully formed legislative policies, making this an opportune time to model any of their effects and plan accordingly.

URL: <https://www.taxathand.com/article/39086/United-States/2025/US-tax-law-impact-on-non-US-headquartered-multinational-businesses>

Various jurisdictions: Tax Transformation Trends 2025 report available

Deloitte's *Tax Transformation Trends 2025: Rising to meet the moment* covers key trends that emerged from research based on a survey of 1,000 tax and finance leaders and a series of interviews with heads of tax at multinational businesses. The research shows that leaders are focused on data, compliance, cost management, automation and artificial intelligence, and finding their optimal resource mix.

URL: <https://www.taxathand.com/article/39089/United-States/2025/Tax-Transformation-Trends-2025-report-available>

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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