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## **Australia: Mid-Year Economic and Fiscal Outlook 2025-26 tax summary**

The treasurer has released the 2025-26 Mid-Year Economic and Fiscal Outlook, and the government has released the 2025-26 Tax Expenditures and Insights Statement. This article focuses on key tax-related announcements on topics including the implementation of the OECD Crypto-Asset Reporting Framework and a domestic crypto tax reporting regime.

URL: <https://www.taxathand.com/article/40716/Australia/2025/Mid-Year-Economic-and-Fiscal-Outlook-2025-26-tax-summary>

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## **Australia: Pillar Two: From policy to practice—Latest ATO guidance**

The Australian Taxation Office has issued guidance relating to the domestic Pillar Two legislation, which covers some of the practical issues raised by stakeholders and provides instruction as the first filing deadlines approach. This article summarizes the new guidance and provides a recap of what has been released to date.

URL: <https://www.taxathand.com/article/40722/Australia/2025/Pillar-Two-From-policy-to-practiceLatest-ATO-guidance>

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## **Bermuda: Tax Credits Act 2025 and Corporate Income Tax Amendment (No. 2) Act 2025 enacted**

The Tax Credits Act 2025 includes measures introducing tax credits designed to be treated as qualified refundable tax credits for purposes of the Pillar Two global minimum tax rules, while the Corporate Income Tax Amendment (No. 2) Act 2025 includes measures that aim to clarify certain provisions and better align the legislation with the Pillar Two rules. This article focuses on selected revisions from the enacted legislation compared to the proposed legislation.

URL: <https://www.taxathand.com/article/40755/Bermuda/2025/Tax-Credits-Act-2025-and-Corporate-Income-Tax-Amendment-No-2-Act-2025-enacted>

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## **Egypt: Threshold for transfer pricing documentation doubled**

The Minister of Finance has issued a decree that raises the threshold for taxpayers to prepare and submit the required transfer pricing documentation (master file, local file, and country-by-country report) to EGP 30 million in related party transactions. The decree also provides a safe harbor for small and medium-sized enterprises, which requires such enterprises to report related party transactions only in their annual tax returns.

URL: <https://www.taxathand.com/article/40760/Egypt/2025/Threshold-for-transfer-pricing-documentation-doubled>

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## **France: Special law to guarantee continuity of nation adopted**

The parliament has adopted a special law to maintain in 2026 the tax rules that were in place in 2025 and authorize the collection of existing taxes. It does not include any tax provisions; however, discussions regarding the 2026 finance bill (which were suspended) are expected to resume shortly.

URL: <https://www.taxathand.com/article/40757/France/2025/Special-law-to-guarantee-continuity-of-nation-adopted>

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## **Germany: Upper house approves bill to update minimum taxation rules**

The upper house of parliament has approved a bill that includes amendments to the Pillar Two minimum taxation rules. The main purpose of the bill is to implement through the minimum taxation rules the country-by-country reporting safe harbor rules as described in the December 2023 OECD Pillar Two guidance.

URL: <https://www.taxathand.com/article/40732/Germany/2025/Upper-house-approves-bill-to-update-minimum-taxation-rules>

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## **Germany: Upper house approves DAC 8 implementation law**

The upper house of parliament has approved the Cryptocurrency Tax Transparency Act, to implement into domestic law the EU directive on the automatic exchange of information on crypto assets between EU jurisdictions. The law introduces a new reporting standard for crypto asset transactions and includes an extension of the Common Reporting Standard to cover new digital financial products, as well as an amendment to the Platform Tax Transparency Act.

URL: <https://www.taxathand.com/article/40751/Germany/2025/Upper-house-approves-DAC-8-implementation-law->

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## **Hong Kong SAR: Consultation launched on implementation of CARF and amended CRS**

The Financial Services and the Treasury Bureau and the Inland Revenue Department have jointly released a consultation paper titled *Implementation of Crypto-Asset Reporting Framework and Amendments in relation to Common Reporting Standard in Hong Kong*. This initiative underscores Hong Kong SAR's commitment to global tax compliance and its response to evolving digital asset markets. The public is invited to provide feedback by 6 February 2026.

URL: <https://www.taxathand.com/article/40753/Hong-Kong-SAR/2025/Consultation-launched-on-implementation-of-CARF-and-amended-CRS>

## **Luxembourg: Parliament approves key tax and social measures for 2026**

The parliament has adopted bills containing individual income taxation, energy and environmental taxation, and social security measures, as well as certain other tax measures. The measures generally are expected to apply as from 2026 and include the introduction of a tax credit for individuals investing in startups, as well as social security increases.

URL: <https://www.taxathand.com/article/40750/Luxembourg/2025/Parliament-approves-key-tax-and-social-measures-for-2026>

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## **Netherlands: 2026 tax plan package adopted by Senate**

The Senate has approved several bills contained in the 2026 tax plan package, which include amendments to the Dutch Minimum Taxation Act 2024, implementation of the EU directive on the exchange of top-up tax information returns, and amendments to the Environment Management Act relating to a carbon border adjustment mechanism, as well as various other tax measures.

URL: <https://www.taxathand.com/article/40734/Netherlands/2025/2026-tax-plan-package-adopted-by-Senate>

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## **OECD: IFCMA launches new climate policy database**

The Inclusive Forum on Carbon Mitigation Approaches has released the first edition of a climate policy database and online dashboard providing information on how governments are addressing climate change through policy action. The database includes information on subsidies, taxes, emissions trading systems, and technology and performance standards, in addition to framework regulations and labeling schemes.

URL: <https://www.taxathand.com/article/40742/OECD/2025/IFCMA-launches-new-climate-policy-database>

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## **OECD: Pillar Two: Side-by-side package released**

The OECD/G20 Inclusive Framework on BEPS has published details of a “side-by-side package” in relation to the Pillar Two global minimum tax rules, including agreed administrative guidance on a permanent simplified effective tax rate safe harbor, an extension of the transitional country-by-country reporting safe harbor, a substance-based tax incentive safe harbor, and a side-by-side system.

URL: <https://www.taxathand.com/article/40762/OECD/2026/OECD-Pillar-Two-Side-by-side-package-released>

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## **United States: Notice 2026-01 provides safe harbor for section 45Q carbon capture credit for 2025**

The Treasury Department and the Internal Revenue Service have released a notice that provides interim guidance for taxpayers intending to claim a certain credit for carbon oxide sequestration, specifically in regard to a safe harbor for determining eligibility for the credit.

URL: <https://www.taxathand.com/article/40756/United-States/2025/Notice-2026-01-provides-safe-harbor-for-section-45Q-carbon-capture-credit-for-2025>

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## **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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## **Various jurisdictions: Tax treaty round up: Changes effective as from 1 January 2026**

An update on certain tax treaties, agreements, and protocols that became effective (or were terminated) on 1 January 2026 with respect to their provisions on withholding taxes.

URL: <https://www.taxathand.com/article/40758/United-States/2026/Tax-treaty-round-up-Changes-effective-as-from-1-January-2026>

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