



MEMBER ORGANISATIONS / OBSERVERS / STANDING GUEST IN 2021

CFE is an umbrella organisation representing the tax profession in Europe. On 31 December 2021, our members comprised 32 professional organisations from 25 European countries, representing more than 200,000 individual members, and 1 standing guest organisation from Uzbekistan. Our functions are to safeguard the professional interests of tax advisers, to assure the quality of tax services provided by tax advisers, to exchange information about national tax laws and professional law, and to contribute to the coordination of tax law in Europe.

	AT	Kammer der Steuerberater und Wirtschaftsprüfer (KSW)	**	PT	Associação Portuguesa de Consultores Fiscais (APCF)
	BE	Institute for Tax Advisors & Accountants (ITAA)		RO	Camera Consultanților Fiscali (CCF)
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			#	SK	Slovenská komora danových poradcov (SKDP)
	CZ	Komora daňových poradců ČR (KDPČR)	8	SI	Zbornica Davčnih Svetovalcev Slovenije
(6)	ES	Asociación Española de Asesores Fiscales (AEDAF)		SM	Ordinei dei Dottori Commercialisti e degli
		Registro de Economistas de Asesores Fiscales (REAF)	FREE		Esperti Contabili (ODCEC)
	FI	Suomen Veroasiantuntijat ry (Association		UK	The Chartered Institute of Taxation (CIOT)
		for Finnish Tax Professionals)			Tax Faculty – Institute of Chartered Accountants in England and Wales (ICAEW)
	FR	Institut des Avocats Conseils Fiscaux (IACF)			
	HR	Hrvatska Komora Poreznih Savjetnika (HKPS)	Observ	vers:	
				LT	Association of Lithuanian Tax Advisers
	IE	The Irish Tax Institute (ITI)	*	ME	Institute of Accountants and Auditors of Montenegro
	IT	Associazione Nazionale Tributaristi Italiani (ANTI)			
		Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC)		NL	De Nederlandse Vereniging van Advocaten-Belastingkundigen (NVAB)
	LU	Ordre des Experts-Comptables (OEC)	®	RS	The Association of Tax Advisors of Serbia
	LV	Latvijas Nodoklu Konsultantu Asociacija		RU	Palata Nalogovych Konsultantov (Chamber of Tax Advisers)
4	МТ	Malta Institute of Taxation (MIT)	0	SI	Tax Advisory Chamber of Slovenia (DSZS)
	NL	Register Belastingadviseurs (RB)			
		De Nederlandse Orde van Belastingadviseurs (NOB)	Standi	ing gu	est:
	PL	Krajowa Izba Doradców Podatkowych (KIDP)	(.:::i	UZ	The Chamber of Tax Advisors of Uzbekistan



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FOREWORD 4



Piergiorgio Valente President, CFE Tax Advisers Europe

2021 saw the continuation of the exceptional circumstances caused by the COVID-19 crisis. Since the start of the COVID-19 pandemic, our lives have been changed in ways previously unimaginable. World leaders have declared that this pandemic has caused disruption comparable only to the World War II. In such incredibly difficult times, the CFE Executive Board is so grateful that our work as a tax professional organisation has not only continued but been able to excel in many ways.

This year, CFE held all meetings and conferences virtually, including the CFE Annual Forum, the General Assembly, the Spring Technical Committee Meetings, the physical meetings of the CFE General Assembly, scheduled to be held in September in Seville, and the 14th European Professional Affairs Conference, which we hoped would be held in Zagreb in November. The safety and wellbeing of our members, our staff and our partners remain the utmost priority of the CFE Executive Board in making these difficult choices, and we sincerely hope that 2022 will see improvement in the pandemic, allowing us to resume meeting in person again.

In 2021, the CFE Executive Board together with the CFE Technical Committees and CFE Team continued to work on existing projects and focus on relevant new technical publications and policy developments, in close conjunction with the Member Organisations and in synergy with the work of the EU institutions and the OECD. Spurred on by the limitations on meeting in-person due to the pandemic, CFE also accelerated the implementation of our Digital Strategy, a key part of which is the creation of digital, online content for our members. The silver lining of this crisis has been the opportunity to transfer and deliver content online, allowing us to provide the best experts and speakers, for the benefit of our joint membership. We have been able to deliver content on international and European tax law and policy to all our members.

If we ask ourselves why international cooperation matters - well, no single country is isolated from international developments, the world is interconnected, our clients are connected, and so are policy makers - how taxation looks tomorrow is decided at international level, the OECD and EU. This was made evident through the landmark two-pillar agreement reached on corporate taxation by the OECD's Inclusive Framework, which will ensure multinational companies pay more tax in the countries where they operate, as well as introduce a global minimum 15% corporate tax rate. CFE has contributed to this process and we will continue to follow further developments on this agreement and analyse the technical detail of the agreement as it is made available to the public.

These historical tax policy developments have been shaped with input from numerous stakeholders across jurisdictions. CFE's

role continues to be pivotal in such developments, which in turn has an impact on the way the tax profession operates, and the directives that come out of the EU which affect the complexity of the tax landscape. A key body that advises the EU Commission on matters of tax policy is the Platform Tax Good Governance, which is chaired by Mr Benjamin Angel, Director at the European Commission, DG TAXUD. CFE has been a full member of this consultative body for the EU Commission for two mandates, represented by myself and Aleksandar Ivanovski, Director of Tax Policy at CFE. In October this year we were pleased to be able to demonstrate CFE's role as thought leaders in professional standards for tax advisers, when we presented to the Platform for Tax Good Governance the CFE's key work project from 2021, our discussion paper on ethical judgment in tax planning, which sets out an ethical quality bar for all tax advisers. CFE are leading discussions on promoting ethical professional judgment across all tax advisers in Europe, and the paper seeks to steer all advisers in the direction of an appropriate balance between the rights and obligations of taxpayers, avoiding abusive planning. CFE's work on the matter is expected to continue throughout next year.

CFE's contribution in this area is particularly topical in light of the international agreement reached on corporate taxation, and visà-vis the inability to collect tax and revenue that is perceived by the public to belong to developing countries profoundly affects the perception of fairness in the system, resulting in decreased tax morale and minimal compliance with the law. The work of the Global Forum, as well as the EU with its Blacklisting process, has therefore been instrumental in addressing these issues. CFE, as founding members of GTAP, the Global Tax Advisers Platform, have been actively involved in the process by providing input on the OECD consultations on tax morale, the draft toolkit for negotiation of tax treaties and more.

CFE is proud to be a relatively small organisation with a significant impact. With a small technical team but very dedicated volunteers from our Member Organisations and advisers who volunteer to assist the CFE Executive Board, we have made and continue to make significant impact on the development of the tax profession. We work with our members and gather the best professionals across Europe to share their expertise, exchange views, learn from each other, and most importantly, agree on a common European view on tax policy which is then conveyed to the European Union, the OECD, UN and the Platform for Collaboration on Tax. The focus on international tax policy continues to evolve and CFE Tax Advisers Europe will continue to support our member organisations in their educational endeavours for their members. In doing this CFE continues to give continuous, high-level participation at EU, OECD, UN level and, thus, ensure that tax professionals have a voice that is heard in matters of international tax policy.

5 WELCOME



Gaetano RagucciPresident of the National Association of Italian Tax Advisers (ANTI) Professor of Tax Law at the University of Milan

In 2021, the economic policies of States hit by the COVID emergency mitigated job losses and related social tensions, and preserved the productive capacity of national economic systems. According to the OECD's September 2021 study, it is reasonable to expect that in Italy the acceleration of vaccination rates and the easing of restrictions will, together with significant fiscal supports to households and firms, foster recovery in the short term, albeit at rates that differ for the different economic areas affected.

Tax policies will therefore continue to be essential until the recovery is consolidated and more focused, also as a result of the acceleration of the processes of termination of unprofitable businesses, and of the reconversion of productive factors to the benefit of the most technologically-advanced and environmentally friendly sectors. During 2021, A.N.T.I. continued to work on several projects with CFE's help and carried forward multiple dialogue activities with both national and European institutions. This was done to promote structural reforms aimed at fostering the necessary investments for the transition to a more productive and eco-friendly growth. Moreover, given the rates of tax collection and tax evasion in Italy, fiscal reforms can make a decisive contribution to improving investments' results both in terms of economic growth and equity. In this framework, A.N.T.I.'s action has been consistently in line with the OECD recommendations on tax policy.

In March 2021, in the context of the hearings conducted by the joint Finance Committees of the House and the Senate, A.N.T.I. presented a document in favour of a reform of the tax system. Such a document was based on the recovery of income taxation through the criteria of universality and progressivity which are currently highly affected by a legislative production of low quality, and negatively conditioned by the political volatility of the different parliamentary majorities that have alternated over time.

In this context, A.N.T.I. stresses the need for a clear distinction between structural tax relief measures and tax expenditures, and for the recovery of the latter within the scope of government policy as clearly highlighted by appropriate changes in the State budget's regulation. Furthermore, A.N.T.I. believes that income tax reform should take into account the impact of property taxes, including estate and inheritance taxes. Among the required measures for recovery, A.N.T.I. places high value on

the tax justice reform. The establishment of a specialized and career judiciary will prepare the system to recover values (starting from rationality and legal certainty), in addition to the balancing of the State budget, and to the development of civil and political values implicit in tax legislation.

This reform will constitute an investment in knowledge and innovation from which the entire dynamics of taxation will have much to gain. Such an investment is thus necessary, since the institutional structure of the subject cannot avoid reflecting the pluralism of the values of a complex society, without further detaching itself from those same institutions, which caused such an alienation in the first place. In addition, in line with the OECD's suggestions, A.N.T.I. states that the simplification of regulatory burdens on taxpayers must be a primary commitment of the legislator. Therefore, in 2021 it signed a protocol with the Institute of Legislative Science ISLE for the revision of the vast complex of regulations in force in Italy, with the aim of reorganizing them into a Single Tax Code. As such, the rules' quality will be increased, and the number of rules will be reduced. This will contribute to the simplification of the regulatory framework of reference, also with a view to improve tax compliance. In relation to the future of European tax law, the project to introduce new own resources for the EU budget, made necessary by the repayment of loans taken out under the Next Generation EU, will have to respect the decision-making powers that national authorities possess in the tax field.

In this respect, and in line with the results of the work of the Own Resources Working Group led in 2016 by Mario Monti, it will be necessary to ensure that the new own resources, added to national levies, do not increase the overall tax burden for the EU taxpayer. On the contrary, a reduction in national contributions, combined with EU spending better designed to support policies with higher added value such as, for example, external border security and defence, will improve European governance, and bring savings for Member States' budgets.

Currently, A.N.T.I. is working on a study on the aforementioned issues in collaboration with CFE, and in the future will continue its activities of publication of documents and collaboration with national and European institutions, for the rationalization and improvement of the multilevel tax system, in accordance with the principles of the rule of law.







Opinion Statement CFE 2/2021 on the EU Digital **Levy Consultation**

Issued by CFE Tax Advisers Europe Submitted to the EU Institutions on 12 April 2021







FISCAL COMMITTEE

Overview

CFE's Fiscal Committee is comprised of two Sub-Committees: the Direct Taxes Subcommittee and Indirect Taxes Subcommittee, which focus on monitoring and responding to developments in tax policy and tax law at both European and international level. The Fiscal Committee aims to provide members with a cohesive view of the current state of affairs in tax policy by providing detailed analyses and updates concerning the work of the EU, OECD and UN as well as to contribute with practical insights to tax policy regulatory initiatives.

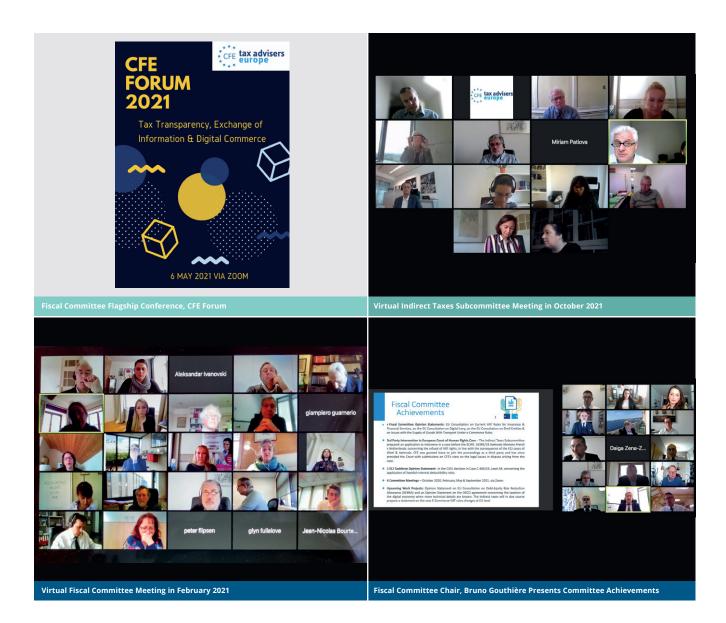
In 2021, the Fiscal Committee was chaired by Bruno Gouthière. The Direct Taxes Subcommittee was chaired by Jos Goubert, and the Indirect Taxes Subcommittee was chaired by Jeremy Woolf. Member and observer organisations nominate delegates who form the committee, attend the Fiscal Committee's technical meetings and are contacted on a regular basis concerning developments in taxation policy. The views communicated to CFE by those delegates are then represented in CFE's opinion statements and outreach work in both European and international tax fora.

Activities

In 2021, the ongoing circumstances brought about by the coronavirus crisis provided the Fiscal Committee further opportunities to explore digital means to collaborate on tax issues which it considered to be most relevant to the interests of its members. Notwithstanding the inability to meet throughout the year in person, the Fiscal Committee held virtual meetings in February, May and October, and also held a number of ad hoc virtual meetings on specific issues which required attention from the Committee during the year.

The Committee in particular focussed on analysing tax policy developments emanating from the EU Commission, OECD and UN. The means by which the Fiscal Committee carries out the work relating to its priorities include the following activities:

- Monitoring relevant tax policy developments at both European and international level;
- Reviewing legislative developments and monitoring



progress within Member States on the implementation of tax reforms;

- Publishing Opinion Statements setting out the views of the Fiscal Committee on tax policy developments, many of which have been republished in leading tax journals in Europe;
- Engaging with European Commission, European Parliament and the OECD concerning tax policy developments and providing specific input setting out the views of members on these matters;
- Distributing updates and questionnaires to delegates concerning tax matters of particular importance;
- Representing CFE Tax Advisers Europe at multiple taxation expert groups, including:
 - EU Platform for Tax Good Governance;
 - EU VAT Expert Group;
 - EU VAT Forum;
 - UN Committee of Experts in International Cooperation in Tax Matters.

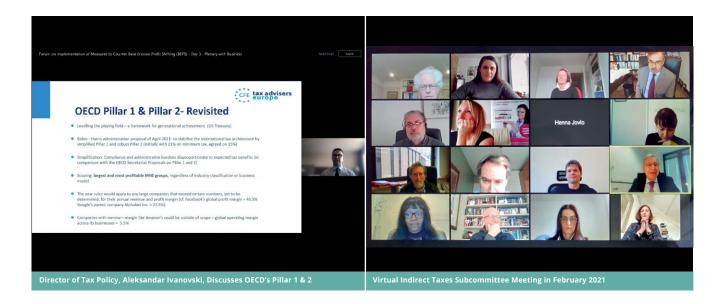
Priorities

In 2021 the Fiscal Committee represented the views of members by engaging with the European Commission and OECD on relevant policy initiatives and matters of importance to the Committee, participated in various international expert groups, and issued publications and Opinion Statements on various tax policy developments throughout the year.

Significant priorities of the Fiscal Committee in 2021 included:

Landmark OECD Agreement on International Tax Reform

On 1 July, the OECD announced that 130 countries had signed a global agreement on international tax reform, based on a two-pillar solution which allows multinational companies to pay more tax in the countries where they operate as well as a global minimum tax rate. It is estimated that a total amount of USD 100 billion of profits per year will be reallocated to the market jurisdictions, under the rules agreed in Pillar One.



The global minimum corporate income tax under Pillar Two, set at 15%, will generate USD 150 billion in additional global tax revenues annually. The OECD also estimates there will be additional revenue due to the stabilisation of the international tax system after years of uncertainty and the patchwork of newly introduced rules concerning the digitalising economy.

CFE published multiple opinion statements responding to public consultations in the process, setting out its view that a coordinated international policy response is necessary in order to avoid fragmentation of the EU Single Market, and the risk of double or multiple-taxation. Analysing and commenting on further details of the international agreement as they become known will be a priority for CFE in 2022.

European Commission's Corporate Tax Plan: Business Taxation for the 21st Century

In May 2021, the EU Commission published the long-anticipated Communication on Business Taxation for the 21st Century, setting out the Commission's plan for reforming EU corporate taxation to be "fit for the realities of the modern global economy".

The Communication identifies issues such as adapting to the challenges of digitalisation, post-COVID economic recovery, an aging population, sustainable green taxation policies and the patchwork of corporate tax systems in the Single Market leading to tax competition as underpinning the strategy in the Communication. The main pillars of the Commission proposal included the following:

- Common rulebook for a better business environment in the Single Market "Business in Europe: Framework for Income Taxation" (or BEFIT) intended to cut red tape, reduce compliance costs and minimise tax avoidance;
- Ensuring greater public transparency: requiring certain large companies to publish their effective tax rates;
- Supporting businesses to recover from COVID-19: recommending Member States allow companies to offset their 2020 and 2021 losses against taxes they paid before 2020;
- Tackling the abusive use of shell companies: monitoring

- and reporting requirements for shell companies so tax authorities can better respond to aggressive tax planning;
- Addressing the debt-equity bias in corporate taxation: Encouraging companies to seek finance through equity rather than debt: DEBRA proposal;
- "On the road to 2050: Rethinking the EU tax mix", a proposal in support of EU's green and digital ambition.

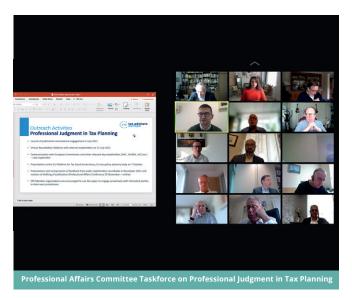
The Fiscal Committee was able to discuss aspects of the plan at its technical meetings throughout the year, and respond by way of public consultation input and Opinion Statements concerning the plans for shell entities and debt-equity bias in corporate taxation.

European Commission Consultation on Fighting the Use of Shell Entities

As part of the Corporate Tax Plan, the European Commission launched a public consultation questionnaire on tax avoidance and fighting the use of shell entities for tax purposes. The questionnaire responses will be used to prepare a proposal for a directive planned to be published in the coming months. The Fiscal Committee issued an opinion statement setting out CFE's view that new anti-avoidance initiatives are not necessary at present, given the number of existing rules and practices enshrined in EU law which would be suitable to address the concerns outlined in the EU initiative to tackle abusive use of shell entities for tax avoidance purposes. CFE opined that prior to any potential EU action, the Commission, in cooperation with Member States should assess Member States' practices and legislation (where existing) to address use of shell entities for tax avoidance and evasion purposes. Monitoring developments concerning this file will be a priority for the Fiscal Committee in 2022.

Implementation of the European Commission e-Commerce Directive

Due to the extraordinary consequences of the COVID-19 outbreak, in 2020 the European Commission proposed to delay the entry into force of the VAT E-commerce package until 1 July 2021. Early in 2021, there was speculation in policy circles that the implementation may be delayed further, however Mr Patrice Pillet, Head of VAT at the European Commission,



confirmed at the CFE Forum in May that there would not be a second delay to the entry into force of the new EU VAT rules concerning e-commerce/trade of goods.

The Indirect Taxes Subcommittee discussed issues concerning the implementation of the new rules at meetings in May, September and November, and issued an opinion statement on certain aspects of the rules. The Indirect Taxes Subcommittee also provided feedback on issues being experienced in practice which in its opinion require attention by the European Commission via the CFE representatives at the European Commission VAT Expert Group. Delegates of the Indirect Taxes Subcommittee also provided input on discussions which took place at VAT Expert Group meetings throughout the year. In addition, a panel at the CFE Forum in May was devoted to the then-upcoming changes, and the predicted issues that would arise after implementation. This topic will remain a priority for the Fiscal Committee into 2022. The new rules entered into force on 1 July 2021.

European Commission Consultation on EU VAT Rules in Insurance & Finance

The EU Commission conducted a public consultation in the second quarter of 2021 concerning VAT rules for financial and insurance services. The initiative to review the VAT rules for financial and insurance services was contained in the Commission's 2020 Tax Package Action Plan, based on the fact the existing rules have been criticised for being complex and difficult to apply, leading to uncertainty, high compliance costs and lack of VAT neutrality. An impact assessment was also prepared on the implications of either removing the existing exemption or keeping it and modifying the scope, as well as concerning issues caused by the current exemption such as cost-sharing and issues with calculating VAT on high-frequency trading. Input from the public consultation was to be used to feed into a proposal for a directive to "address the competitive disadvantage faced by financial and insurance operators... caused by irrecoverable VAT".

The Fiscal Committee issued an Opinion Statement responding

to the public consultation, setting out its view that the view that current exemption works well in general in the sector. However, CFE also opined in the statement that it is unfortunate the CJEU case law precludes the application of the cost sharing exemption and, particularly on transactions between Member States, there are problems with VAT-grouping. CFE also set out its view that the restrictive interpretation and ambit of the exemptions causes problems with outsourcing, and is a possible reason for extending the scope of the exemptions.

CFE suggested in its statement that if the exemptions are retained, ideally the entire supply chain would be exempted, and definitions would be provided of what falls under the scope of insurance, i.e. whether it extends to back-office outsourcing and the like and that implementing any changes in a regulation would have the benefit of increasing harmonisation, which in turn should assist in simplifying the analysis of transactions between Member States. A proposed directive is anticipated to be published in the coming months, and responding to the draft directive will be a priority for the Fiscal Committee.

Intervention in European Court of Human Rights Case

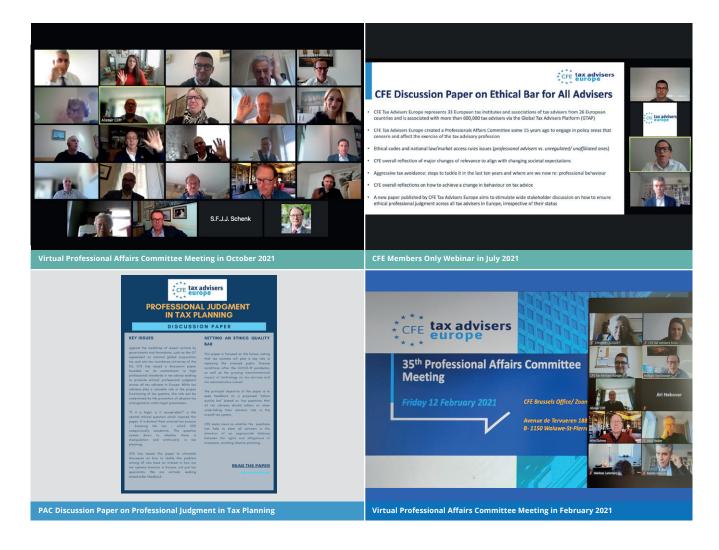
The Indirect Taxes Subcommittee of the Fiscal Committee also prepared an application to intervene in a case before the European Court of Human Rights, 16395/18 Italmoda Mariano Previti v Netherlands, concerning the refusal of VAT rights, in line with the consequence of the decisions of the Court of Justice of the European Union in (Joined Cases C-439/04 and C-440/04) Kittel v Belgium and Belgium v Recolta Recycling SPRL, as subsequently developed by the Court of Justice of the European Union in (C 131/13) Staatssecretaris van Financi n v. Schoenimport "Italmoda" Mariano Previti vof.

CFE was successful in its application, and was granted leave to join the proceedings as a third party. CFE has since provided the Court with submissions on CFE's view on the legal issues in dispute arising from the case. The parties are now awaiting further directions in the proceedings from the Court.

Publications & Tax Technical Work of the Fiscal Committee

In 2021, the Fiscal Committee of CFE Tax Advisers Europe published 5 Opinion Statements:

- Opinion Statement FC 1/2021 on the Proposal to Confer Implementing Powers on the EU VAT Committee.
- Opinion Statement FC 2/2021 on the EU Digital Levy Consultation.
- Opinion Statement FC 3/2021 on the EU Consultation on Current VAT Rules for Insurance & Financial Services.
- Opinion Statement FC 4/2021 on Issues with Supply of Goods with Transport Under e-Commerce Rules.
- Opinion Statement FC 5/2021 on the European Commission Public Consultation on Fighting the Use of Shell Entities for Tax Purposes.



PROFESSIONAL AFFAIRS COMMITTEE

Overview

The Professional Affairs Committee engages in the policy areas that concern and affect the exercise of the tax advisory profession. By way of submitting technical submissions and engaging with the European Commission and the OECD, the Professional Affairs Committee advances the CFE Board priorities that concern the tax advisory profession at large. In 2021, the Professional Affairs Committee was chaired by Philippe Vanclooster.

Apart from partaking in ongoing discussions with the EU Commission in different policy areas, the Professional Affairs Committee regularly responds to various EU and OECD questionnaires and also drafts technical updates of relevance for tax advisers which are aimed at informing the members of recent developments. In 2021, the Professional Affairs Committee participated in various initiatives at EU and OECD level that aim to contribute to the ongoing policy debate and to voice the concerns of European tax advisers.

The work of the Professional Affairs Committee broadly covers issues such as: ethics and professional codes, anti-money laundering, reporting of tax avoidance schemes, cooperation with

tax authorities, digitalisation of tax services, taxpayers' rights, tax certainty, professional qualifications and regulation, liability and insurance, cross-border mobility, business structures of tax firms, client confidentiality and legal privilege.

Activities

Following the work of the European Commission and the OECD in more detail, the Professional Affairs Committee contributed to the ongoing policy discussion of relevance for tax advisers with tax technical comments in the form of opinion statements and policy submissions to the European Commission and the OECD, as well as through ongoing participation in meetings and activities of the European Commission, European Parliament and the OECD.

In 2021, the Professional Affairs Committee published the following Opinion Statements:

- Opinion Statement PAC 1/2021 on the European Commission Initiative/Roadmap for Reform on Cross-Border Provision on Professional Services of March 2021.
- **Discussion Paper** on Professional Judgement in Tax Planning An Ethics Quality Bar for All Tax Advisers.
- **Opinion Statement PAC 2/2021** on the European Commission's Public Taxpayers' Rights Consultation on Simplified Procedures for Better Tax Compliance.

Priorities

Professional Judgment in Tax Advice

In 2020, against the backdrop of recent actions by governments and lawmakers, such as the G7 agreement on minimal global corporation tax and anti-tax avoidance initiatives of the EU, the Professional Affairs Committee launched a project on professional judgment in tax advice founded on its commitment to high professional standards in tax advice seeking to promote ethical professional judgment across all tax advisers in Europe. The aim of the project is to achieve a more holistic and informed understanding in European policy circles of the role that professional tax advisers can play in "future-proofing" tax systems in a way that modern societies expect and deserve.

In 2021, responses from a questionnaire used to launch the project were analysed and used as the basis for the discussion paper published in June this year by the Committee, entitled "Professional Judgement in Tax Planning - An Ethics Quality Bar for All Tax Advisers". While tax advisers play a valuable role in the proper functioning of tax systems, this role can be undermined by the promotion of abusive tax arrangements within legal parameters. "If it is legal, is it acceptable?" is the central ethical question which inspired this paper. It is distinct from criminal tax evasion – breaking the law – which CFE unequivocally condemns. The guestion comes down to whether there is manipulation and artificiality in tax planning. CFE has issued this paper to stimulate discussion on how to tackle this problem among all who have an interest in how our tax systems function in Europe, not just tax specialists. CFE through the discussion paper seeks views on whether the questions can help to steer all advisers in the direction of an appropriate balance between the rights and obligations of taxpayers, avoiding abusive planning.

In October, the Committee were pleased to be able to demonstrate CFE's role as thought leaders in professional standards for tax advisers, by presenting the paper to the members of the European Commission Expert Group, the Platform Tax Good Governance, which is chaired by Mr Benjamin Angel, Director at the European Commission, DG TAXUD.

In November, CFE's 14th European Conference on Professional Affairs took place as a virtual roundtable event, examining the topic of professional standards in tax advice, and the proposed "ethics quality bar" set out in CFE's recently issued discussion paper. CFE's work on the matter is expected to continue throughout next year.

Mandatory Disclosure Rules & Exchange of Information

The Council Directive on mandatory automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements ("DAC6") entered into force on 25 June 2018, introducing complex mandatory disclosure rules for intermediaries across the EU. In 2020, following the outbreak of the coronavirus, public requests were made by financial and professional association organisations seeking leniency in the enforcement of penalties and deadlines contained within the Directive. CFE in its intervention urged the Council of the EU and the European Commission to mitigate the challenges faced by intermediaries in such circumstances, to allow leniency for Member States to delay

the enforcement of penalties related to compliance with national DAC6 implementing legislation.

The deadlines contained in the EU Directive on Administrative Cooperation for reporting of relevant cross-border arrangements were thereafter postponed by 6 months. Disclosure requirements began to apply to intermediaries from 1 January 2021. The Committee monitored and discussed the implementation of the reporting requirements throughout the year at its technical meetings, and will conduct a survey concerning the DAC6 implementation and practical reporting requirements of implementing legislation in 2022.

EU Anti-Money Laundering Package

In July, the European Commission published its Anti-Money Laundering legislative package, which will upgrade the existing EU Anti-Money framework by establishing an EU AML supervisory body, a single rulebook for AML across the EU, extend the application of the AML framework to the crypto sector, impose an EU-wide cash payment limit of EUR 10,000 and create a "black-list" and "grey-list" based on the recommendations made by the global money laundering and terrorist financing watchdog, Financial Action Task Force (FATF).

The Professional Affairs Committee earlier published an Opinion Statement on the AML Action Plan, welcoming the possibility for a more harmonised approach at EU level, that builds on and supplements the work of national supervisory bodies which could potentially be complemented and coordinated by an EU-supervisory body, and reiterating prior input asking the EU Commission to consider why the risk for tax advisers has not been reduced compared to the initial risk assessments, despite all the measures introduced over the years.

The ongoing evolution of the EU Anti-Money Laundering Legislation is an ongoing priority for the Professional Affairs Committee and the Professional Affairs Committee will continue to monitor the legislative process and issue statements or participate in any further public consultations concerning the legislative package.

Taxpayers Rights and Obligations

In the second quarter of 2021, the European Commission conducted a public consultation concerning a Recommendation to Member States to facilitate the implementation of taxpayers' rights and simplify tax obligations to ensure better tax compliance. The Recommendation forms part of the Commission's Tax Package Action Plan, and aims to improve awareness of taxpayers' rights throughout the EU. Albert Raedler, who is leading the EU Commission Communication & Recommendation initiatives on taxpayers rights spoke at CFE's 13th European Professional Affairs Conference in 2020 concerning the initiative.

The Professional Affairs Committee issued a response to the consultation, stating that from a CFE perspective, double taxation continues to be an issue in spite of positive developments such as the enactment of the EU Dispute Resolution Mechanisms Directive and that relief of double taxation should continue to be a priority for Member states and the European Union in areas of shared competence. However, the Committee also set out

its view that a project on taxpayers' rights should be focused on promoting taxpayers' rights, either via legislation or via codes or charters. CFE reiterated the importance taxpayers' rights for tax good governance, and the role that clear statements of taxpayer, and tax administration, rights and obligations, can play in this respect. CFE expressed support for continuation of work on the Commission project of November 2016 on Guidelines for a Model for A European Taxpayers' Code.

To that end, in 2021, the CFE Professional Affairs Committee continued work on the project on collating information about the way in which taxpayer rights and obligations are dealt with in CFE Member countries and how those countries deal with complaints about the way the tax system operates and affects the individual taxpayer. This work will continue in 2022.

European Parliament Permanent Tax Subcommittee

In June 2020, the European Parliament voted to establish a permanent tax subcommittee to the Committee on Economic and Monetary Affairs. The subcommittee is responsible for investigating issues surrounding "tax-related matters, and particularly the fight against tax fraud, tax evasion and tax avoidance, as well as financial transparency for taxation purposes". The move to create a permanent tax subcommittee had been anticipated following on from several temporary inquiries into specific tax scandals being established in the past.

In 2021, CFE representatives were regularly in attendance at the many virtual hearings of the tax subcommittee which took place over the year, CFE were also fortunate enough to have MEP Paul Tang participate in the 14th Conference on Professional Affairs in November, to discuss the discussion paper issued by the Professional Affairs Committee on professional judgment in tax planning, proposing an ethical quality bar for all tax advisers. CFE will continue to closely follow the work of the Tax Subcommittee in 2022.

TAX TECHNOLOGY COMMITTEE

Overview

The Tax Technology Committee (TTC) was established in 2018 as a response to the manifest importance of digital taxation and technology and its applications in taxation both now and for the foreseeable future. In this regard, the TTC has a different approach to tax and technology, being devoted to digital transformation and all its ramifications for tax. In 2021, the CFE Tax Technology Committee was chaired by Ian Hayes.

The committee operates in a horizontal rather than a vertical way. This means that, upon identifying the topics the Committee feels are important to address, each subject is then headed up by project leader with a small operational team and report on the subject to the Committee, which thereafter makes recommendations for further action and progress of the working group.

The Tax Technology Committee is in particular focused on the role professionals handling tax in all manifestations will have and the risks and opportunities posed to them by the development of technology and the increasingly direct interaction between tax-payer and revenue authorities.

Activities

In 2021, the pandemic period brought with it a significant impact on working practices, and the advancement of digital practices within tax administrations. For CFE this has provided opportunities to develop online working and communication both for the Committees and the Office, as well as many developments in the tax technology sphere for the Committee to monitor and discuss at technical meetings.

As such, the decision of CFE to establish the Tax Technology Committee is proving to be invaluable as tax administrations move quickly to be digitalised whilst economic activities adjust on a daily basis to new systems, new processes and enhanced capacities which challenge the ability of existing tax practice to cope. In spite of a short existence, the TTC have been able to focus on specific, relevant topics and have a small team of highly enthusiastic and knowledgeable professionals keeping pace with developments.

As such, the topics of Making Tax Digital, Blockchain applications for tax, and cryptocurrencies continued to be the main focus of work of the Committee. The Committee were fortunate enough to hear from experts at meetings and the CFE Forum, who discussed emerging developments in tax technology and the significance that those changes may have for tax practice and tax advisers. The Committee uses this information to interpret and communicate that to the community we represent, our stakeholders and our members.

In 2021, Committee members also gave the first in what will become a series of webinars on specific and more detailed technology subjects relevant to CFE's members. The Committee will also continue identifying issues associated with making tax digital, collecting and collating the reaction of tax advisers and tax-payers in differing countries. Our overarching goal will continue to be establishing and maintaining a position of primacy and influence within the area of tax technology.

In 2021, the Tax Technology Committee published the following Opinion Statements:

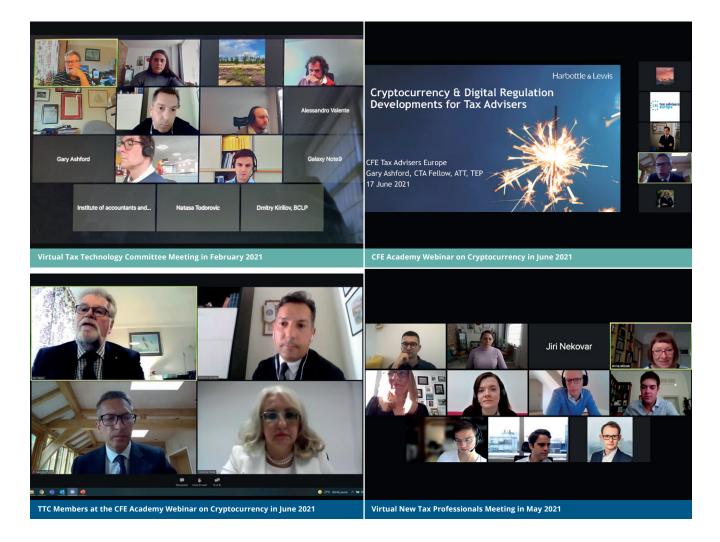
 Opinion Statement TTC 1/2021 on the EU Platform for Tax Good Governance Questionnaire on Extending DAC to Include Cryptocurrencies & e-Assets.

Priorities

Cryptocurrencies

At the beginning of 2021, the European Commission conducted a public consultation on expanding the current directive on administrative cooperation, to provide for the automatic exchange of information in the field of taxation to include crypto-assets and e-money. The directive will aim to provide tax administrations with information to allow for the proper taxation of income and revenues related to new means of payment and investment.

The Tax Technology Committee provided input not only to this consultation, but also to an earlier consultation undertaken within the EU Platform for Tax Good Governance. The Committee issued an opinion statement setting out its views on the topic. The working group will continue to monitor European developments in this field.



Blockchain

Blockchain remained a priority topic for the Tax Technology Committee in 2021. The Committee welcomed Mrs Trang Fernandez-Leenknecht, an expert in finance technology and investment based in Switzerland, who provided the Committee members with an oversight of recent developments in Blockchain at its meeting in May.

The Tax Technology Committee continued to monitor software developments that derive from Blockchain and how the software can be used for legitimate tax administration purposes. In 2022, the Committee will continue to closely follow the developments on the area and report to delegates.

Making Tax Digital

As more tax administrations go digital, countries are implementing new data submission and electronic auditing requirements, creating new sets of challenges for tax advisers. To that end, in 2021, the Making Tax Digital working group issued a questionnaire which was designed and developed as an essential review and comparison tool, producing meaningful data both for us and revenue administrations to monitor the developments on the digitalisation of tax administrations and report to its members. In 2022, this questionnaire will be rolled out to all CFE Technical Committees to widen the input that has been collected to date. Thereafter the input will be summarised and published on the CFE website.

NEW TAX PROFESSIONALS AD HOC COMMITTEE

The New Tax Professionals (NTP) Ad Hoc Committee was formally established during the CFE General Assembly held in Torino on 04 October 2019. The NTP Ad Hoc Committee was formed to represent new tax professionals from within CFE Tax Advisers Europe, allowing them to better understand how different Member Organisations work, promote relevant issues in their jurisdictions and build a cross-border network of the future generation of tax leaders. The Committee considers new tax professionals someone within their first 10-15 years of practice (or 10-15 years of membership of the Member Organisation). In 2021, the Chair of the New Tax Professionals Ad Hoc Committee was Anna Misiak.

The New Tax Professionals Ad Hoc Committee enables the representation of the views of newer members to the CFE, and facilitates the sharing of knowledge, information and experience between delegates within the CFE and the NTP. The Committee also aims to help provide potential future delegates and Committee members for the CFE and Member Organisations, through helping to increase understanding of the CFE, and increasing the visibility of future leaders to those who are currently part of the CFE leadership.

I. ECJ TASK FORCE 14



In 2021, the NTP examined differences in support from Member States and Member Organisations for new start-ups and compared social security/personal income tax solutions for self-employed persons across the Member States. This included a review of the use of management companies to provide professional services to a company and the rules and laws concerning contractor/employee conditions in each country. The NTP also discussed enterprise investment schemes and whether tax relief is provided by Member States.

Future topics to be examined in 2022 include green taxes, tax policy responses of the Member States to deal with economic recovery from the coronavirus crisis, and other differences and similarities among tax systems in Europe.

ECJ TASK FORCE

The CFE ECJ Task Force is a group of tax academics and renowned tax practitioners which meets regularly to discuss and issue opinion statements on selected decisions of the Court of Justice of the European Union. The Task Force was assembled in 1997 by current CFE Vice-President Stella Raventòs-Calvo at the request of Bruno Gangemi, who served as Chair of the Fiscal Committee from 1997 to 2000. The founding members of the Task Force were Philip Baker, Paul Farmer, Bruno Gangemi, Luc Hinnekens, Albert Raedlert, and Stella Raventós-Calvo.

Since 2013, the ECJ Task Force has been chaired by Georg Kofler (CFE Tax Advisers Europe, Austria) and its current members are Alfredo Garcia Prats (Professor at the University of Valencia), Werner Haslehner (Professor at the University of Luxembourg). Volker Heydt (Former official of the European Commission), Eric Kemmeren (Professor of International Taxation and International Tax Law at the Fiscal Institute Tilburg of Tilburg University), Georg Kofler (Chair of the Task Force and Professor at the Institute for Austrian and International Tax Law of WU Wien), Michael Lang (Professor at the Institute for Austrian and International Tax Law of WU Wien), João Nogueira (Deputy Academic Chairman at IBFD), Christiana HJI Panayi (Professor at Queen Mary University of London), Emmanuel Raingeard de la Blétière (Associate Professor

at the University of Rennes, Partner PwC France), Stella Raventós-Calvo (President of AEDAF and Vice-President of CFE), Isabelle Richelle (Co-Chair of the Tax Institute - HEC - University of Liège, Brussels Bar Elegis), Alexander Rust (Professor at the Institute for Austrian and International Tax Law of WU Wien), and Rupert Shiers (Partner at Hogan Lovells).

The ECJ Task Force generally meets four times a year for full-day meetings, which in 2021 all took place via virtual means. The Task Force aims at analysing Court decisions with wide impact and providing high-level practical input to tax practitioners on selected judgments by the Court of Justice of the European Union through its Opinion Statements. In 2021, the following Opinion Statements (ECJ-TF) were issued:

- Opinion Statement ECJ-TF 1/2021 on the CJEU decision in Case C-484/19, Lexel AB, concerning the application of Swedish interest deductibility rules.
- Opinion Statement ECJ-TF 2/2021 on the CJEU decision in Case C-403/19, Société Générale, on the calculation of the maximum amount of a foreign direct tax credit.
- Opinion Statement ECJ-TF 3/2021 on the CJEU decision of 18 March 2021 in Case C-388/19, MK, concerning tax on capital gains from immovable property.

These Opinion Statements are submitted directly to the European Institutions, disseminated to a wide audience of tax practitioners and academics throughout Europe and published in IBFD's "European Taxation" journal.

The ECJ Task Force and its members are also actively involved in the organisation of and as speakers at an annual conference at the University of Luxembourg. Topics over the last years have been "Landmark Decisions in Direct Tax Jurisprudence" (2014), "Primary Law Limits to Direct Taxation: Fundamental Rights, Fundamental Freedoms and State Aid" (2015). "EU Tax Policy in the 21st Century" (2016), "Time and Tax" (2017); "Tax and the Digital Economy" (2018); and "The Anti-Tax Avoidance Directive" (2019). The 2020 conference was unfortunately cancelled due to the coronavirus crisis, but in 2021 a virtual conference took place on the topic of "Alternative Dispute Resolution in International



Taxation". The books containing the written contributions for the conferences are edited by Task Force Members Werner Haslehner, Georg Kofler and Alexander Rust together with Aikaterini Pantazatou (University of Luxembourg) and have been published by Kluwer and Edward Elgar, respectively, and are well accepted and widely cited in academic literature.

CFE ENGAGEMENT

European Commission Platform for Tax Good Governance

The European Commission's Platform for Tax Good Governance, Aggressive Tax Planning and Double Taxation was established by the European Commission in order to seek advice and assistance from expert stakeholders in the field of tax good governance, aggressive tax planning and double taxation. The Platform also provides an opportunity for members to exchange views and have an open dialogue with the European Commission and tax administrations concerning significant taxation issues facing the tax profession and wider society. CFE has been a member of the Platform since its inception in 2012 and has benefited from the opportunity to provide its input on many significant taxation issues through its participation at the expert group.

CFE is honoured to be among the limited number of non-governmental members and to be the only organisation of advisers in the professional tax field selected to participate in the important work the Platform carries out. CFE's term at the Platform for Tax Good Governance will run until 31 October 2022, after which time CFE will have the possibility to renew its participation. CFE is represented at the Platform by CFE President, Piergiorgio Valente and Aleksandar Ivanovski, Director of Tax Policy at CFE Tax Advisers Europe.

In October 2021, CFE presented to the Platform for Tax Good Governance the CFE's key work project from 2021, the discussion paper on ethical judgment in tax planning, which sets out an ethical quality bar for all tax advisers. CFE were pleased to be able to demonstrate its role as a thought leader in professional standards for tax advisers at the Platform, leading discussions on promoting ethical professional judgment across all tax advisers

in Europe. CFE seeks to steer all advisers in the direction of an appropriate balance between the rights and obligations of tax-payers, avoiding abusive planning.

Given the technical expertise within the CFE organisation and its status as being a leader in tax knowledge, CFE is able to draw on the direct link it has to the experience of practitioners across the EU and its regular involvement in the areas of tax good governance, double taxation and tax planning to contribute to the valuable work of the Platform.

European Commission VAT Expert Group

The VAT Expert Group was established by the European Commission in 2012 in order to bring together experts who can advise the Commission on the preparation of legislative acts and other policy initiatives in the field of VAT and provide insight concerning the practical implementation of legislative acts and other EU policy initiatives in the field of VAT. CFE Tax Advisers Europe has been a member of the Expert Group since its inception in 2012.

The group is composed of individuals appointed in a personal capacity with requisite expertise in the area of VAT, and organisations representing particular businesses and tax practitioners that can assist in the development and implementation of VAT policies. The Chair and Vice Chair of the CFE Indirect Taxes Subcommittee, Jeremy Woolf and Trudy Perié, were the CFE Tax Advisers Europe representatives to the Group in 2021.

The Expert Group were consulted by the European Commission in relation to a number of issues, including VAT in the digital age and e-invoicing, as well as technical issues concerning the e-commerce rules and EU guidance on the VAT "quick fixes". The VAT Expert Group are also preparing advice on fixed establishment issues arising from ECJ caselaw, and single VAT registration. CFE was active in contributing to all topics, and elaborated further on these issues in both Opinion Statements and written representations to the Commission.

European Commission EU VAT Forum

The EU VAT Forum was established by the European Commission in 2012 and offers a discussion platform for business and VAT

authorities to informally discuss practical tax administration issues with regard to VAT in a cross-border environment and share insights on possible ways to manage the current VAT system more efficiently, ensuring a smoother functioning of the system, how the implementation of VAT legislation can be improved in practice and to assist the Commission in promoting good practices. CFE has been a member of the EU VAT Forum since its inception in 2012. The CFE representatives for 2021 were Aleksandra Heinzer and Christian Amand.

In 2021, the CFE representatives were involved in a subgroup carrying out work on cross-border sanctions and interest, and a subgroup on cross-border rulings. The Forum also worked on identifying issues that will arise in practice from the recently introduce e-commerce rules.

United Nations Tax Committee

The UN Committee of Experts in International Cooperation in Tax Matters (UN Tax Committee) typically meets twice a year, in April in New York and in October in Geneva. CFE applied for, and was granted, NGO (non-governmental organisation) status with the UN in 2006, and has participated at the meetings of the UN Tax Committee since that time. These meetings were originally held once per year but increased to twice per year from 2017 to reflect the increased importance of tax matters within the UN as determined at the Addis Ababa Finance For Development Conference in 2015.

In 2021, the meetings of the UN Tax Committee were once again held virtually due to the restrictions on travel caused by the COVID-19 outbreak. In 2021, the Chair of the CFE Direct Tax Subcommittee, Jos Goubert, took part in online sessions. In particular, the Committee of Experts approved a new treaty provision concerning tax on digital services to be inserted into the UN Model Tax Convention. The session also addressed progress on updating the Model Double Taxation Convention Between Developed and Developing Countries, as well as environmental taxation and taxation of the extractive industries.

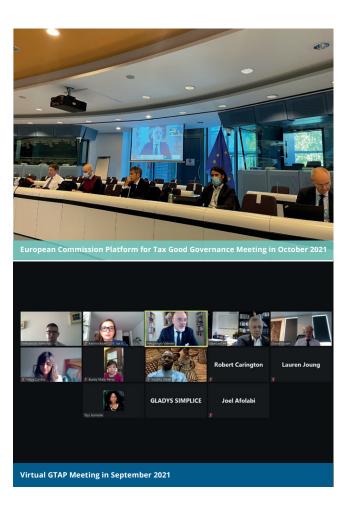
EU Institutions

European Commission

Notwithstanding the difficulties of remote working in 2021 due to the COVID-19 crisis, CFE continued to maintain regular meetings with representatives from the European Commission to exchange views and discuss policy and other technical aspects related to the policy priorities of CFE Tax Advisers Europe.

At the CFE Forum which took place in May 2021, CFE was fortunate enough to welcome two European Commission speakers at the event: Ms Astrid Van Mierlo, Deputy Head of Unit, Direct Tax Policy & Cooperation, who discussed the proposals to expand the EU directive on administrative cooperation to include reporting on cryptocurrencies and e-assets, and Patrice Pillet, Head of VAT at the European Commission, who participated in a panel which focused on the practical implications of the new e-commerce rules which entered into force on 1 July 2021.

Maintaining a constructive working relationship with the



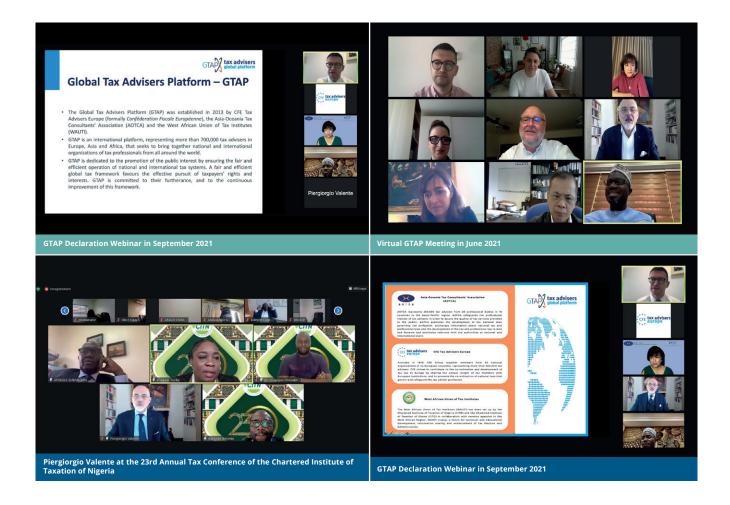
European Commission will remain a priority for CFE Tax Advisers Europe in 2022.

European Parliament

CFE Tax Advisers Europe was honoured to conclude a Memorandum of Understanding with the European Parliament on a strategic partnership in the context of the EU elections and beyond in 2019, and celebrated its 60th Anniversary under the High Patronage of the European Parliament.

CFE has remained engaged with the European Parliament under the terms of the Memorandum of Understanding, collaborating with the Parliament on various partner outreach seminars. CFE was also in regular contact with Members of the European Parliament and their advisors. In particular, CFE focused efforts on Members of the European Parliament's Permanent Tax Subcommittee to the Committee on Economic and Monetary Affairs, established in June 2020.

The Chair of the Permanent Tax Subcommittee, MEP Paul Tang, spoke at CFE's 14th European Conference on Professional Affairs, held virtually on 25 November 2021. Mr Tang addressed conference attendees concerning the discussion paper published by CFE on professional standards in tax planning, expressing his support for the CFE project and the need for reform of ethical standards in tax advice.



Global Tax Advisers Platform

CFE Tax Advisers Europe is a founding member of the Global Tax Advisers Platform ("GTAP"), formed in 2013. GTAP is an international platform, representing more than 700,000 tax advisers in Europe, Asia and Africa, that seeks to bring together national and international organizations of tax professionals from all around the world.

GTAP is dedicated to the promotion of the public interest by ensuring the fair and efficient operation of national and international tax systems. A fair and efficient global tax framework favours the effective pursuit of taxpayers' and tax advisers' rights and interests. GTAP is committed to their furtherance, and to the continuous improvement of this framework.

The founding members of GTAP are CFE Tax Advisers Europe, the Asia-Oceania Tax Consultants' Association (AOTCA), and the West Africa Union of Tax Institutes (WAUTI), the observer members are the International Association of Financial Executives Institutes (IAFEI), the Society of Trust and Estate Practitioners (STEP), and the Arc Méditerranéen des Auditeurs (AMA), and Centro di Diritto Penale Tributario (CDPT). It is a key priority for GTAP to expand its membership and international network in order to reach tax professionals in all corners of the globe, effectively enabling the most inclusive dialogue and interaction.

Unfortunately, due to the COVID-19 outbreak, GTAP meetings and conferences were unable to take place in person in 2021. However, virtual meetings were held instead to ensure the important work of the Platform continued. Significantly, GTAP issued a Declaration identifying five key priorities in international taxation in the eyes of the organisation, which was approved unanimously by representatives of its founding organisations. The five priorities identified by GTAP in the 2021 Declaration are: COVID-19 and tax as a means of economic recovery; climate, green, natural resources and the circular economy; tax morale; tax and digitalisation; and tax and blockchain. On Friday 24 September 2021 representatives of the CFE, AOTCA and WAUTI held a virtual declaration signature seminar, during which they presented and discussed the importance of the main findings and the key priorities contained in the 2021 Declaration at the virtual roundtable event.

The 2021 Declaration will be signed at conferences to be held throughout 2022 in Dakar, Brussels and Bali.



CFE publishes its Policy Report for Semester II 2020.



CFE prepares its Opinion Statement on the European Commission's Public Consultation Concerning an EU Digital Levy.



CFE holds its flagship Forum virtually via Zoom on the topic of "Tax Transparency, Exchange of Information & Digital Commerce".

JANUARY

FEBRUARY

MARCH

APRIL

N/I

MAY J

JUNE JULY

On 25 February 2021, the CFE Academy hosts a webinar on the topic of "Tax Implications of Brexit". The webinar featured CFE delegates Jeremy Woolf, Trudy Perié, and Aleksandra Heinzer as panellists.



On 22 April 2021, the CFE
Academy holds a webinar
on the topic of "Key EU
Tax Law Developments for
Tax Advisers: Recent ECJ
Caselaw", featuring academic
experts from the CFE's ECJ
Taskforce: Prof. Dr Georg
Kofler, Chair of the Task Force,
Dr Isabelle Richelle, Prof. Dr.
Alexander Rust and Dr João
Nogueira as panelists.



The Professional Affairs Committee publishes its discussion paper on Professional Judgment in Tax Advice, proposing an ethics quality bar for all tax advisers.







The Albert J. Rädler Medal Award 2020 for academic excellence in European taxation is awarded to Mr Pieter Bernsen of King College London for his LLM dissertation entitled "The object and purpose of the principal purpose test in tax treaties".



Representatives from GTAP held a virtual declaration signature ceremony, presenting the key priorities contained in the 2021 GTAP Declaration.



The 14th European Conference on Tax Advisers' Professional Affairs is held virtually, on the topic of "Professional Judgment in Tax Planning: An Ethics Quality Bar for All Tax Advisers – 'If It Is Legal, Is It Acceptable?"

AUGUST

SEPTEMBER

OCTOBER

NOVEMBER

DECEMBER

The CFE issues an Opinion Statement FC 5/2021 on the European Commission Public Consultation on Fighting the Use of Shell Entities for Tax Purposes.



OPINION

Opinion Statement FC 5/2021 on the European Commission Public Consultation on Fighting the Use of Shell Entitles for Tax Purposes

Issued by CFE Tax Advisers Europe Submitted to the EU Institutions on 27 August 2021 CFE President Piergiorgio
Valente gives the annual CFE
Academy lecture at the 5th
Annual Conference of the
Mongolian Association of
Certified Tax Consultants on
the topic of "International
Tax Policy: The Road Ahead".



The CFE ECJ Task Force publishes an Opinion Statement on the CJEU decision in Case C-388/19, MK v Autoridade Tributária e Aduaneira, on the taxpayers' option to avoid discriminatory taxation of capital gains.



OPINION STATEMENT

Opinion Statement ECI-TF 3/2021 on the CJEU decision of 19 March 2021 in Case C-388/19, MK v Autoridade Tributária e Aduaneira, on the taxpayers' option to avoid discriminatory taxation of capital gains

repared by the CFE ECJ Task Force submitted to the EU Institutions in December 2021







CFE FORUM 2021

The CFE's 2021 Forum was held virtually on 6 May 2021, on the topic of "Tax Transparency, Exchange of Information & Digital Commerce", examining European and global developments in the protection of taxpayers' rights and the impact and implications of technology on taxpayers' rights.

The Forum was opened by the Director of the Centre for Tax Policy at the OECD, Pascal Saint-Amans, with a keynote speech on the panel discussion topic of cross-border exchange of information. Mr Saint-Amans confirmed that the OECD aims to update reporting standards for exchange of information to include cryptocurrencies and e-assets by the end 2021. In particular, he noted that the US is particularly interested in the expansion of the reporting standards to include crypto-assets. Mr Saint-Amans also confirmed that the G20 meeting of Finance Ministers in July was still the intended deadline for an agreement to be reached on finding international taxation solutions for the digital economy.

The first panel also discussed cross-border exchange of information in the EU, as well as implications for taxpayers' rights. This encompassed the use of information by tax authorities. Speakers on the panel included: Astrid Van Mierlo, Deputy Head of Unit, Direct Tax Policy & Cooperation, European Commission, Dan Danielescu, Head of Task, European Court of Auditors, and Wim Roels, Legal Adviser, European Commission Legal Service. The panel was moderated by Bruno Gouthière, Chair of the Fiscal Committee and Partner at CMS Francis Lefebvre Avocats, France.

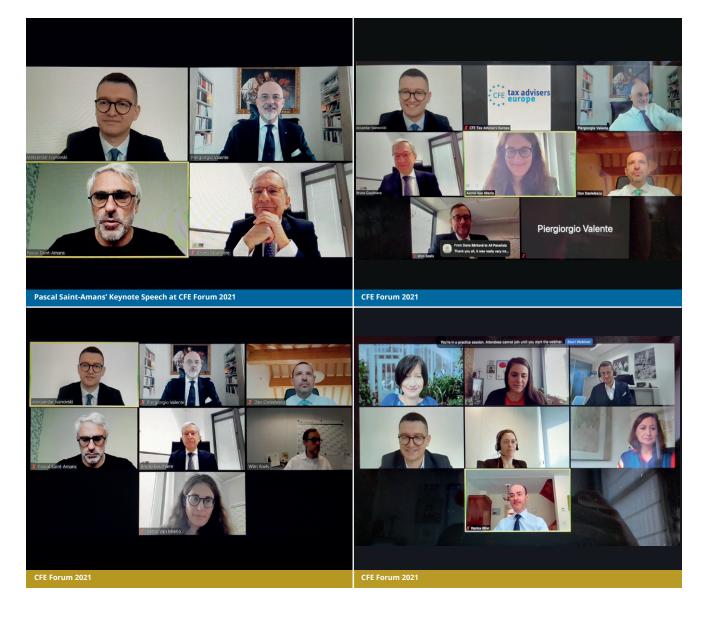
The second panel examined the topic of VAT in the digital economy, and the effects of the new, simplified VAT rules in respect of the abolition of distance sales rules and making platforms liable for VAT on sales from outside the EU, and their resulting challenges for business and advisers digital platforms and practice. The panellists included: Patrice Pillet, Head of VAT at the European Commission, Madeleine Merkx, Professor of Indirect Taxes, Erasmus University, The Netherlands, Erwan Loquet, Tax Partner, BDO, Luxembourg

and Yuliya Logunova, Head of Tax, Europe, Rakuten. The panel discussion was moderated by Trudy Perié, Counsel at Loyens & Loeff, The Netherlands. At the conference, Patrice Pillet confirmed that there would not be a second delay to the entry into force of the new EU VAT rules concerning e-commerce/trade of goods: "The date of 1 July is certain, all of the EU's 27 member countries have said that they will be ready for the rules when they are due to come into place".

The Indirect Taxes Subcommittee discussed issues concerning the implementation of the new rules at meetings in 2021, and issued an opinion statement on certain aspects of the rules. The Indirect Taxes Subcommittee also provided feedback on issues being experienced in practice which in its opinion require attention by the European Commission via the CFE representatives at the European Commission VAT Expert Group. Delegates of the Indirect Taxes Subcommittee also provided input on discussions which took place at VAT Expert Group meetings throughout the year. In addition, a panel at the CFE Forum in May was devoted to the then-upcoming changes, and the predicted issues that would

arise after implementation. This topic would remain a priority for the Fiscal Committee into 2022. The new rules entered into force on 1 July 2021.

Mr Saint-Amans discussed that negotiations on the OECD global agreement on minimum corporate income tax under Pillar Two were then ongoing but would be announced over the summer. Since the Forum, the agreement reached for a minimum corporate income tax rate of 15% will generate USD 150 billion in additional global tax revenues annually. The OECD also estimates there will be additional revenue due to the stabilisation of the international tax system after years of uncertainty and the patchwork of newly introduced rules concerning the digitalising economy. CFE published multiple opinion statements responding to public consultations in the process, setting out its view that a coordinated international policy response is necessary in order to avoid fragmentation of the EU Single Market, and the risk of double or multiple-taxation. Analysing and commenting on further details of the international agreement as they become known will be a priority for CFE in 2022.











CFE ACADEMY

The CFE Tax Academy aims to share knowledge and experience on tax matters while exchanging ideas on practical tax issues. The Academy creates opportunities for tax professionals to be updated on global tax developments through attending seminars and trainings.

In 2021, a CFE Academy event took place virtually on 10 November 2021, hosted by the Mongolian Associates of Tax Consultants, with CFE President Piergiorgio Valente giving a seminar on the topic of "International Tax Policy: The Road Ahead" at the 5th

Annual Conference of the Mongolian Association of Certified Tax Consultants.

In addition, a number of e-learning webinars were recorded and broadcast in 2021 by the CFE Tax Academy, making technical content available online for CFE members during the COVID-19 outbreak. The webinars were produced in cooperation between CFE Tax Advisers Europe and the Consiglio Nazioanle dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC) on topics concerning European and international taxation. The speakers were academics and practitioners associated with CFE Tax Advisers Europe.

On 25 February 2021 a webinar on the topic of "Tax Implications of Brexit" took place. The webinar featured Jeremy Woolf, Barrister from Pump Court Tax Chambers, the United Kingdom; Trudy Perié, from Loyens & Loeff, the Netherlands; and Aleksandra Heinzer, EU VAT specialist from Slovenia as panellists. Aleksandar Ivanovski, Director of Tax Policy, moderated the webinar.

On 22 April 2021 a webinar on the topic of "Key EU Tax Law Developments for Tax Advisers: Recent ECJ Caselaw" took place. The panel was comprised of academic experts from the CFE's ECJ Taskforce: Prof. Dr Georg Kofler, Chair of the Task Force, Dr Isabelle Richelle, Prof. Dr. Alexander Rust and Dr João Nogueira. Aleksandar Ivanovski, Director of Tax Policy at CFE moderated the seminar

On 17 June 2021 a webinar on the topic of "Cryptocurrency & Digital Regulation Developments for Tax Advisers" took place. The panel was comprised of Dame Ksenija Cipek, Head of Tax Risk Analysis,

Ministry of Finance, Tax Administration, Croatia, Antonio Lanotte, Of Counsel Chartered Tax Adviser, Loconte & Partners, Italy and Gary Ashford, Partner at Harbottle & Lewis, United Kingdom. Ian Hayes, Chair of the CFE Tax Technology Committee moderated the webinar.

On 8 July 2021 the CFE Professional Affairs Committee hosted a CFE-members only webinar to present the recently published discussion paper on professional standards in tax advice to all CFE Member Organisations. The Professional Affairs Committee during the webinar sought feedback on whether the paper and the ethics quality bar can help to steer advisers in the direction of an appropriate balance between the rights and obligations of taxpayers, avoiding abusive planning.

CNDCEC and CFE members can enrol in the European Register of Tax Advisers and can attend CFE Academy's online courses to keep up to date on pertinent issues in European and international tax.

AWARD OF THE CFE ALBERT J. RÄDLER MEDAL 2020



The Albert J. Rädler Medal Award 2020 for academic excellence in European taxation was awarded to Mr Pieter Bernsen of King College London for his LLM dissertation entitled "The object and purpose of the principal purpose test in tax treaties".

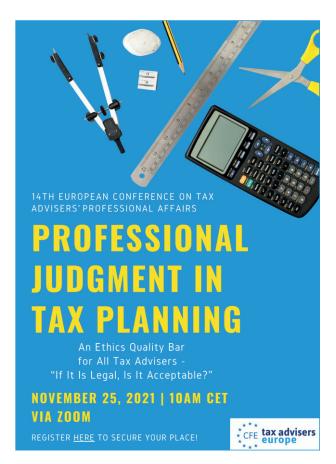
The CFE Albert J. Rädler Medal Award was launched in 2013 to encourage academic excellence among young tax students in the field of European taxation, and to recognise the outstanding contribution to the field of taxation of the late Professor Albert J. Rädler.

The CFE Academic Jury, composed of Prof. Dr Pasquale Pistone, Prof. Dr Michael Lang and Prof. Dr Otmar Thömmes, stated of the thesis that "The well structured dissertation addresses a topic of significant importance in international tax law. In the introduction chapter the author lays out the framework for his analysis and provides a good summary of the historic

background for the principal purpose test (PPT). Bernsen explains why the PPT was put in the body of the OECD Model Convention rather than just in its commentary. He argues that determining the purpose of a transaction and determining a tax benefit are tasks that are often intertwined and that the presence of tax avoidance is pivotal to denying the tax treaty benefits in the end.

Bernsen favors a narrow interpretation of the PPT if an initially existing economic purposes ceases to exist at a later stage but leaves the question open of what the minimum time period for the existence of the economic purpose should be. He profoundly discusses the PPT in the context of the Vienna Convention of the Law of Treaties (VCLT) and reviews case law on tax treaty cases in select jurisdictions to demonstrate how the application of the PPT to those cases might have altered the outcome. Bernsen examines the two tests of the PPT by applying these to three case studies. He also sheds light at the relationship between the PPT and the case law of the European Court of Justice in the field of Member States anti-avoidance measures. The author rightly points to the risk of varying interpretations of the PPT at State level instead of the development of a much desired common understanding of an OECD wide autonomous anti abuse concept."

The CFE Executive Board and CFE Academic Jury warmly congratulates Mr Bernsen, and wish him the best in his future career.





14TH EUROPEAN CONFERENCE ON TAX ADVISERS' PROFESSIONAL AFFAIRS

The 14th European Webinar Conference on Tax Advisers' Professional Affairs was held virtually on Monday, 25 November 2021, on the topic of "Professional Judgment in Tax Planning: An Ethics Quality Bar for All Tax Advisers – 'If It Is Legal, Is It Acceptable?'"

The conference examined the proposed "ethics quality bar" set out in CFE's discussion paper issued in June 2021, which propsed a set of quality bar questions for all tax advisers to reflect on when undertaking their advisory role in the overall tax system.

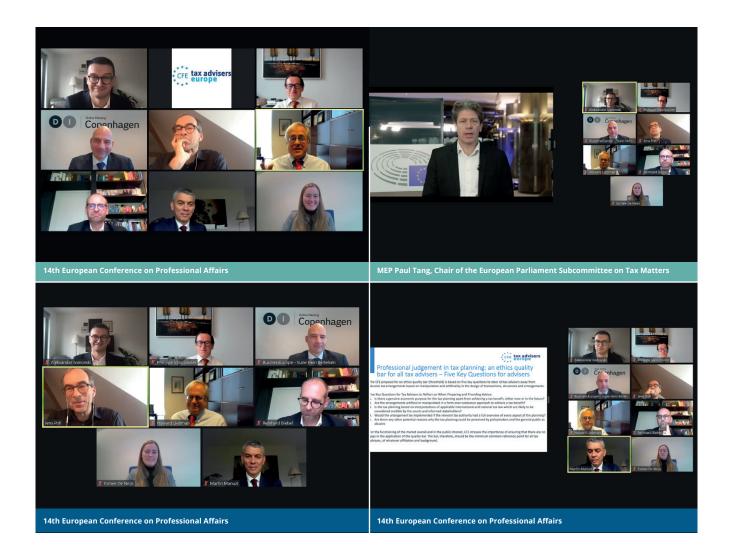
Against the backdrop of recent actions by governments and law-makers, such as the global on minimal global corporation tax and anti-tax avoidance initiatives of the EU, CFE issued its discussion paper founded on its commitment to high professional standards in tax advice seeking to promote ethical professional judgment across all tax advisers in Europe. While tax advisers play a valuable role in the proper functioning of tax systems, this role can be undermined by the promotion of abusive tax arrangements within legal parameters.

"If it is legal, is it acceptable?" is the central ethical question which inspired this paper. It is distinct from criminal tax evasion – breaking the law – which CFE unequivocally condemns. The question comes down to whether there is manipulation and artificiality in tax planning.

CFE issued this paper to stimulate discussion on how to tackle this problem among all who have an interest in how our tax systems function in Europe, not just tax specialists. We are actively seeking stakeholder feedback.

This paper is focused on the future, noting that tax systems will play a key role in repairing the strained public finance conditions after the COVID-19 pandemic, as well as the growing transformational impact of technology on tax services and tax administration overall. The principal objective of the paper is to seek feedback on a proposed "ethics quality bar" based on five questions that all tax advisers should reflect on when undertaking their advisory role in the overall tax system.

The virtual conference welcomed tax experts and academics, featuring: Paul Tang, MEP and Chair of the Subcommittee on Tax Matters at the European Parliament; Esmeé de Mijs, Policy



Advisor to Mr Paul Tang, Reinhard Biebel, Head of Unit, Direct Tax Policy & Cooperation at the European Commission; Sune Hein Bertelsen, Member of the Tax Policy Group at Business Europe; Howard Liebman, Partner at Jones Day, Brussels; Jens Poll, Chair of the Tax Planning and Related Services Task Force at the International Ethics Standards Board for Accountants and Martin Manuzi, Regional Director for Europe at the Institute of Chartered Accountants in England and Wales.

The conference was moderated by Philippe Vanclooster, Chair of the Professional Affairs Committee, and Aleksandar Ivanovski, Director of Tax Policy at CFE Tax Advisers Europe.

The panellists discussed the need to promote ethical professional judgment across all tax advisers, regardless of the different backgrounds, professional affiliations or absence of professional affiliations of tax advisers as well as of market access rules on tax services provision in individual jurisdictions and whether the concept as set out in the CFE paper has the potential to help achieve ethical tax planning across all tax advisers within and across jurisdictions. Panellists also explored how the attitude of business towards tax has shifted in the past years, and whether the business is now only taking into account the legal part of

the tax advice, or whether other considerations are increasingly relevant, such as changed attitudes of business towards tax law and tax administration. To this end, panellists discussed how the changing environment in tax policy has affected business decisions and the nature of tax advice and whether education in tax ethics can play a role going forward. References in the paper to legal obligations on tax advisers to reduce tax liabilities arising from national laws and court rulings and pressures generated by broad taxpayer attitudes were also examined by the panellists.

On the side of the European Union, MEP Paul Tang expressed his views that more needs to be done to ensure that tax advisers are prevented from providing advice that would encourage tax avoidance practices, likening the changes in tax advice behaviours to those of a rehabilitating addict. Mr Reinhard Biebel, Head of Direct Tax at the European Commission, confirmed that the Commission welcomed the discussion paper, but that issues with enforceability and unregulated advisers would remain an issue that the EU intends to further address in the future with further legislative initiatives.

The conference was well attended and received by the audience, and the CFE discussion paper initiative will be the subject of follow-up events and further committee work in 2022.





ANNUAL TAX DINNER

CFE Tax Advisers Europe ordinarily hosts an annual networking dinner each year in the winter in Brussels, which provides the opportunity to strengthen relationships with colleagues and counterparts, and expand engagement beyond formal policy meetings on technical issues.

Attendees are able to exchange views in an informal setting with members of the European Commission working in relevant areas, such as Directorate-General for Taxation and Customs Union (DG TAXUD), Members of the European Parliament with a particular interest in tax and Members of the Council of the European Union.

In 2021 the Annual Tax Networking Dinner was unable to take place due to the restrictions on meeting physically due to the coronavirus pandemic. The CFE Executive Board hopes that 2022 will bring with it improved conditions, allowing the event to once again take place.

CFE CONFERENCE PARTICIPATION

WAUTI 7th Annual Tax Conference – Taxation of the Digital Economy

On 25 February, CFE President, Piergiorgio Valente, participated as a panellist in the 7 th Annual WAUTI Tax Conference in a roundtable discussion on the topic of "Taxation of the Digital Economy: The Journey So Far & Lessons for Africa".

23rd Annual Tax Conference of the Chartered Institute of Taxation of Nigeria

On 20 May, CFE President, Piergiorgio Valente, participated as a panellist in the 23rd Annual Tax Conference of the Chartered Institute of Taxation of Nigeria, in a roundtable discussion on the topic of "Taxation and Social Inclusiveness for Economic Growth: Lessons from Developed Economies".

Global Tax Controversy Virtual 2021 Conference

On 26 May, CFE President, Piergiorgio Valente, participated in the virtual GTC 2021 Conference as a panellist, taking part in discussions concerning the struggle of countries for more tax revenues, how tax authorities will claim a higher slice of the profit pie and how corporations will respond.







5th Annual Conference of the Mongolian Association of Certified Tax Consultants





IOTA 2021 Forum - Implementation of Measures to Counter **BEPS**

On 10 June 2021, Director of CFE Tax Policy, Aleksandar Ivanovski, participated in the 2021 virtual IOTA conference, giving a presentation on the topic of the "New Global Tax Order", discussing the outcome of the negotiations on digital tax held under the indications of the OECD.

2021 Italia-Africa Business Week

On 9 October 2021, Director of CFE Tax Policy, Aleksandar Ivanovski, participated in the 2021 Italia-Africa Business Week, taking part in a roundtable discussion on the topic of "Taxation and Social Inclusiveness for Economic Growth in Africa". CFE President, Piergiorgio Valente, also participated in a panel discussion during the event, as did Ian Hayes, Chair of the Tax Technology Committee.

2021 Caleb University International Conference

On 26 October 2021, CFE President Piergiorgio Valente participated in the inaugural Caleb University International Conference, discussing financial services in a global economy with Professor Teju Somorin, Professor of Taxation Dean, College of Post Graduate Studies.

5th Annual Conference of the Mongolian Association of **Certified Tax Consultants**

On 10 November, CFE Tax Advisers Europe President, Piergiorgio Valente, participated in the Mongolian Association of Certified Tax Consultants' 5th Annual Conference, opening the conference with an address on global tax developments, with a seminar on the topic of "International Tax Policy: The Road Ahead".

AMCHAM Global Business Tax Update

On 30 November 2021 at 18:30 CET the AMCHAM Tax Committee hosted a virtual Global Business Tax Update conference, examining the issues of global tax harmonisation, minimum taxation and increases in business taxation post-COVID-19. Aleksandar Ivanovski, CFE Director of Tax Policy, participated in the conference, discussing the OECD global tax agreement and other EU and US tax policy developments, issues which constitute perhaps the most serious challenge to the restoration of business prosperity during this currently beginning period of business recovery.



5th Annual Conference of the Mongolian Association of Certified Tax Consultants



PIERGIORGIO | | President of the CFE Exa 2021 Caleb University International Conf



CFE PUBLICATIONS

Opinion Statements – Policy and Technical position papers published in 2021 by CFE Tax Advisers Europe

Fiscal Committee:

In 2021, the Fiscal Committee of CFE Tax Advisers Europe published 5 Opinion Statements:

- Opinion Statement FC 1/2021 on the Proposal to Confer Implementing Powers on the EU VAT Committee.
- Opinion Statement FC 2/2021 on the EU Digital Levy Consultation.
- **Opinion Statement FC 3/2021** on the EU Consultation on Current VAT Rules for Insurance & Financial Services.
- Opinion Statement FC 4/2021 on Issues with Supply of Goods with Transport Under e-Commerce Rules.
- Opinion Statement FC 5/2021 on the European Commission Public Consultation on Fighting the Use of Shell Entities for Tax Purposes.

Professional Affairs Committee:

In 2021, the Professional Affairs Committee of CFE Tax Advisers Europe published 2 Opinion Statements and 1 Discussion Paper:

- Opinion Statement PAC 1/2021 on the European Commission Initiative/Roadmap for Reform on Cross-Border Provision on Professional Services of March 2021.
- Discussion Paper on Professional Judgement in Tax Planning An Ethics Quality Bar for All Tax Advisers.
- Opinion Statement PAC 2/2021 on the European Commission's Public Taxpayers' Rights Consultation on Simplified Procedures for Better Tax Compliance.

Tax Technology Committee:

In 2021, the Tax Technology Committee published 1 Opinion Statement:

 Opinion Statement TTC 1/2021 on the EU Platform for Tax Good Governance Questionnaire on Extending DAC to Include Cryptocurrencies & e-Assets.

ECJ Task Force:

In 2021, the ECJ Task Force published 3 Opinion Statements:

- Opinion Statement ECJ-TF 1/2021 on the CJEU decision in Case C-484/19, Lexel AB, concerning the application of Swedish interest deductibility rules.
- Opinion Statement ECJ-TF 2/2021 on the CJEU decision in Case C-403/19, Société Générale, on the calculation of the maximum amount of a foreign direct tax credit.
- **Opinion Statement ECJ-TF 3/2021** on the CJEU decision of 18 March 2021 in Case C-388/19, MK, concerning tax on capital gains from immovable property.

External & Electronic Publications

European Taxation Tax Journal

The leading European tax law journal European Taxation, edited by IBFD, regularly publishes articles on CFE conferences and selected Opinion Statements of particular relevance. European Taxation is the official journal of the CFE Tax Advisers Europe.



Tax Top 5

The "Tax Top 5" is a weekly e-publication containing the most relevant tax news and tax policy developments from the EU institutions, EU courts and OECD from the previous week. The weekly updates are a great success and the Tax Top 5 is now perceived as one of the most reliable and cohesive tax policy update e-publications in Brussels.



Global Tax Top 10

The Global Tax Top 10 is a monthly publication containing a round-up of international tax policy news of wider relevance for tax advisers. The publication was developed in response to the great success of the Tax Top 5, with a view to provide a succinct report on the most impactful tax policy and legislative developments that have taken place around the globe each month.

The publication builds on a long-standing tax technical and policy cooperation between CFE, AOTCA (Asia-Oceania Tax Consultants Association) and WAUTI (West African Union of Tax Institutes), which are the leading tax professionals' organisations of the Asian-Oceanic and West African regions.

Living CFE

"Living CFE" is a bi-annual publication which details the key events and meetings attended or organised by CFE Tax Advisers Europe, as well as technical work published or submitted to international organisations, as well as forthcoming CFE events.

EU Tax Policy Report

The EU Tax Policy Report is a journal style publication, issued bi-annually, that provides a detailed analysis of significant primary law and tax policy developments at both EU and international level which have taken place in the previous six months. It also includes an overview of selected CJEU case-law and relevant European Commission decisions.

V. CFE GOVERNANCE 30

GENERAL ASSEMBLY

The General Assembly is the governing body of CFE Tax Advisers Europe, at which each Member State is able to be represented. The primary responsibilities of the General Assembly are to decide on the acceptance of members and observers, to approve amendments to the governing statutes, to adopt the business report of the Executive Board and to approve the accounts and budget for the CFE. In 2021, the General Assembly was unable to meeting in person, and instead held virtual meetings.

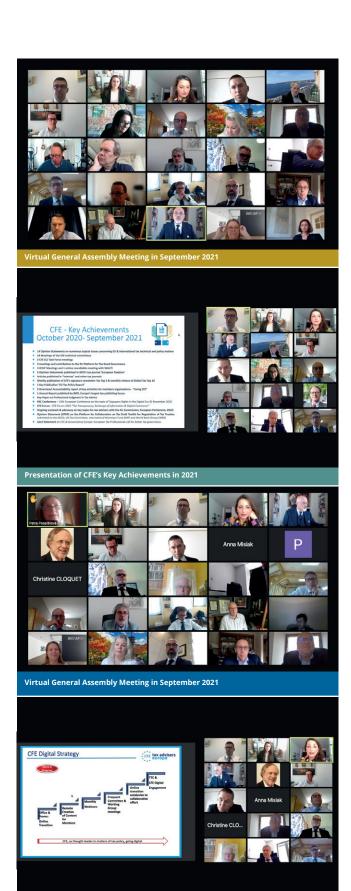
Meetings

In 2021, the CFE held two virtual General Assembly meetings, on 7 May 2021 and 24 September 2021. At both General Assembly meetings, CFE President Piergiorgio Valente reported on updates to CFE's strategic roadmap and milestones achieved.

In May, the new Executive Board for the period of 2021-2022 was welcomed by the General Assembly delegates, and President Piergiorgio Valente presented the list of key achievements at policy, outreach and strategic level from the previous meeting until May 2021. The President highlighted the quality and quantity of work done, noting that the work produced was not interrupted even during the difficult times of the COVID-19 pandemic.

Also at the Spring meeting, the CFE President stressed that CFE is very mindful of the issues surrounding climate change and the need to be proactively linked to policy developments, in close cooperation with Member Organisations. The President announced that the CFE Executive Board is considering the sustainability and climate change aspects in its daily work, in particular through the implementation of the CFE Digital Strategy Transition.

At the Fall meeting, President Piergiorgio Valente presented the key achievements and policy work completed since the meeting which took place earlier in the year in May, in particular concerning the Professional Affairs Committee project on professional judgment in tax planning and the presentation of the work at the EU Commission Platform for Tax Good Governance. The President also discussed the success of the CFE Forum in May and CFE's successful 3rd party intervention in a tax case before the European Court of Human Rights, 16395/18 Italmoda Mariano Previti v Netherlands, concerning the refusal of VAT rights, in line with the consequence of the ECJ cases of Kittel & Italmoda. The General Assembly delegates also voted on the approval of various financial matters, and officially discharged the Executive Board from 2020.



Presentation of the CFE Digital Strategy by Karima Baakil

ORGANISATIONAL STRUCTURE

The General Assembly is the governing body of CFE Tax Advisers Europe, at which each Member State is able to be represented. The primary responsibilities of the General Assembly are to decide on the acceptance of members and observers, to approve amendments to the governing statutes, to adopt the business report of the Executive Board and to approve the accounts and budget for the CFE.

ΕĆ	ATES OF THE GENERAL ASSEMBLY IN 2021
AT	Peter Bartos, Herbert Houf, Klaus Hübner, Philippe Rath, Friedrich Rödler, Franz Schmalzl
BE	Christine Cloquet, Philippe Vanclooster, Bart Van Coile
СН	Massimo Bianchi, Thorsten Kleibold, Christiana Leuker
cz	Jiří Nekovář, Radek Neužil, Petra Pospíšilová, Jana Skálová, Petr Toman
ES	Stella Raventós-Calvo, Agustín Fernández Pérez
FI	Timo Matikkala
FR	Frédéric Teper
HR	Damir Brajković, Bojan Huzanić
IE	Marie Bradley, Martin Lambe
IT	Marco Boidi, Noemi Di Segni, Gilberto Gelosa, Paola Marongiu, Massimo Miani, Giorgio Monasterolo,
	Giovanni Moschetti, Gaetano Ragucci, Alessandro Solidoro, Piergiorgio Valente
LT	Rūta Bilkštyte
LU	Olivier Remacle, Manfred Schneider
LV	Ainis Dābols, Inga Kursīte-Priedīte, Marina Kuzenko, Daiga Zēna-Zēmane
ME	Dijana Jović , Rade Šćekić
MT	Conrad Cassar Torregiani
NL	Dick Barmentlo, Henk Koller, Paul Kraan, Sylvester Schenk, Edwin Visser, Roelof Vos
PT	Francisco de Sousa da Câmara
PL	Mariusz Cieśla, Anna Misiak, Mateusz Stańczyk
RO	Romulus Badea, Dan Manolescu, Ioan Simion
RS	Ivan Simič
RU	Tatiana loffe
SI	Franc Derganc, Ivan Simič, Petra Mlakar
SK	Jozef Danis
SM	Daniela Mina
UK	Gary Ashford, lan Hayes, Martin Manuzi, Nick Parker, Helen Whiteman
UZ	Radmila Karimova, Bahodir Nabijonov

EXECUTIVE BOARD

The Executive Board is in charge of the day to day work of CFE Tax Advisers Europe and reports to the General Assembly. The Board monitors developments in taxation law and the profession within Europe, and devises and manages CFE's work streams arising from these issues. Work is managed through two committees, the Fiscal Committee and the Professional Affairs Committee, which are chaired by a member of the Board.

The Executive Board is composed of 10 people, i.e. the President, three Vice-Presidents, the Secretary General, the Treasurer, the Chair of the Fiscal Committee, the Chair of the Professional Affairs Committee, the Chair of the Tax Technology Committee and one Executive Board Member.

EXECUTIVE BOARD 2021



President **Piergiorgio Valente**



Vice-President Stella Raventós-Calvo



Vice-President **Anna Misiak**



Vice-President

Gary Ashford



Secretary General
Martin Phelan



Treasurer **Branislav Kováč**



Chair of the Fiscal Committee **Bruno Gouthière**



Chair of the Professional Affairs Committee **Philippe Vanclooster**



Chair of the Tax Technology Committee Ian Hayes



Executive Board Member **Jiří Nekovář**

ADVISERS TO THE EXECUTIVE BOARD 2021



Andrew Clarke



Christine Cloquet



Wim Gohres



Friedrich Roedler

FISCAL COMMITTEE

Delegates of the Fiscal Committee 2021

Fiscal Committee Chair: Bruno Gouthière

Direct Taxes Sub-Committee

Chair: Jos Goubert

AT	Georg Kofler, Christine Jasch, Friedrich Rödler
BE	Jos Goubert, Isabelle Richelle (expert)
СН	Pietro Sansonetti, Pascal Hinny
CZ	Luděk Vacík, Lucie Wadurová
ES	Stella Raventós-Calvo, Victor Viana
FI	Visa Kananoja
FR	Olivier Dauchez
HR	Darko Augustinović, Bojan Huzanić
IE	Anne Gunnell
IT	Giampiero Guarnerio, Giovanni Moschetti, Raffaele
	Rizzardi, Nicola Vecchietti Massacci
LT	Rūta Bilkštyte
LU	Vanesa Ramos (expert)
LV	Ruta Tereško
ME	Jelena Stojović
MT	John Ellul Sullivan
NL	Stephen Brunner, Peter Flipsen, Paul Kraan,
	Stan Stevens, Marijke Vervoort
PT	Francisco de Sousa da Câmara
PL	Mariusz Cieśla
RO	Alin Chitu, Adrian Luca, Alin Irimia
RS	Nataša Todorović
RU	Igor Shikov
SI	Barbara Guzina, Dean Košar
SK	Miriam Galandová
SM	Daniela Mina, Monica Zafferani
UK	Gary Ashford, Glyn Fullelove, Christopher Lallemand

FISCAL COMMITTEE

Indirect Taxes Sub-Committee

Chair: Jeremy Woolf

Vice-Chair: Trudy Perié

AT	Ingrid Rattinger, Christine Weinzierl
BE	Christian Amand (expert)
СН	Regine Schulckebier
CZ	Petr Toman, Milan Tomíček
ES	Jaime Rodriguez
FI	Henna Jovio
FR	Nathalie Habibou, Véronique Lenoir
HR	Bojan Huzanić, Vlatko Jelčić
IE	David Duffy
IT	Federico Baridon, Remo Dominici, Ernesto Gatto
LT	Rūta Bilkštyte
LU	Jean-Nicolas Bourtembourg, Erwan Loquet
LV	Inga Kursīte, Marina Kuzenko
ME	Tamara Šćekić
MT	Chris Borg, Matthew Zampa
NL	Paul Cramer, Trudy Perié, Roelof Vos
PT	Francisco de Sousa da Câmara
PL	Mateusz Stańczyk
RO	Daniela Tanase, Mariana Vizoli
RS	Vladimir Stefanovski
RU	Igor Shikov
SI	Aleksandra Heinzer, Tanja Urbanija
SK	Miriam Patiová

UK John Voyez, Jeremy Woolf, Alan McLintock

PROFESSIONAL AFFAIRS COMMITTEE

Delegates of the Professional Affairs Committee 2021

Professional Affairs Committee Chair:

Philippe Vanclooster

AT	Friedrich Rödler
BE	Christine Cloquet, Philippe Vanclooster
СН	Denis Boivin, Kaloyan Stoyanov
CZ	Michal Frankl, Radek Neužil
ES	José Ignacio Alemany
FI	Pekka Talari
FR	Philippe Rochmann
HR	Damir Brajković
IE	Martin Lambe
IT	Gianluigi Longhi, Paola Marongiu, Giorgio
	Monasterolo, Federico Vincenti, Maria Venturini
LT	Rūta Bilkštyte
LU	John Hames
LV	Ilze Birzniece, Marina Kuzenko, Daiga Zēna-Zēmane
ME	Danijela Pejović
MT	Conrad Cassar Torregiani, Robert Taylor East
NL	Dick Barmentlo, Roel Kerckhoffs, Henk Koller, Paul
	Kraan, Marloes Lammers, Bartjan Zoetmulder
PL	Anna Misiak
RO	Alin Irimia, Alexander Miclev
RS	Ivan Simič
RU	Henrietta Belaya
SI	Franc Derganc
SK	Adriana Horváthová, Branislav Kováč,
	Miroslav Marcinčin
UK	Heather Brehcist, Alistair Cliff, Martin Manuzi,
	Nick Parker

TAX TECHNOLOGY COMMITTEE

Delegates of the Tax Technology Committee 2021

Tax Technology Committee Chair: Ian Hayes

AT	Markus Ehgartner
BE	Christophe Meesters
CZ	Milan Vodička
ES	Cristina Carrascosa, Llorenç Maristany
FI	Henri Lehtiluoto
FR	Gaëlle Menu-Lejeune
HR	Damir Brajković, Bojan Huzanić
IE	Martin Lambe, Clare McGuinness
IT	Marco Boidi, Diego Conte, Sebastiano Garufi,
	Alessandro Valente
ME	Tamara Šćekić
MT	Conrad Cassar Torregiani
NL	Adriaan Bijleveld, Willem Faassen,
	Sylvester Schenk
PL	Mariusz Cieśla, Michal Laskowski
RS	Ivan Simič
RU	Dmitry Kirillov
UK	Gary Ashford, Paul Aplin, lan Hayes, Adrian Rudd,
	Richard Wild

ECJ TASK FORCE

Members of the ECJ Task Force 2021

Chair: Georg Kofler

Alfredo García Prats Werner Haslehner Volker Heydt Eric Kemmeren Michal Lang Jürgen Lüdicke Joao Felix Pinto Nogueira Christiana HJI Panayi Emmanuel Raingeard de la Blétière Stella Raventós-Calvo Isabelle Richelle Alexander Rust Rupert Shiers

NEW TAX PROFESSIONALS COMMITTEE

Delegates of the New Tax Professionals Committee 2021

New Tax Professionals Committee Chair: Anna Misiak

AT	Markus Ehgartner, Doris Wagner
BE	Philippe Vandevoorde
CZ	Matěj Nešleha
ES	Andreu Bové
FI	Jenni Parviainen
FR	Nathalie Habibou
HR	Damir Brajković, Bojan Huzanić
IE	Gemma Tugwell
IT	Marco Boidi, Diego Conte, Sebastiano
	Garufi, Alessandro Valente
ME	Saša Klikovac
NL	Pieter van Os
PL	Bartosz Kubista, Anna Misiak
RS	Ivan Simič
UK	Sharlene Botherill, Julia Cockroft,
	Toyin Oyeneyin, Makayla White,

Kieron Batham-Tomkins

CFE OFFICE

The CFE Tax Advisers Europe office in Brussels was set up in 2000 in order to maintain relationships with the European institutions. Since the re-establishment of the CFE as an international association under Belgian law in 2011, the Brussels office is the seat and the head office of the organisation.



Karima Baakil
Office Manager
Phone +32 2 761 00 92
E-mail kbaakil@taxadviserseurope.org



Aleksandar Ivanovski
Director of Tax Policy
Phone +32 2 761 00 91
E-mail aivanovski@taxadviserseurope.org



Brodie McIntosh
Tax Policy Analyst
Phone +32 2 761 00 91
E-mail bmcintosh@taxadviserseurope.org

IMPRESSUM

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Tel. +32 2 761 00 91 Email info@taxadviserseurope.org Twitter @cfe_brussels Website www.taxadviserseurope.org

Responsible for content

Brodie McIntosh

Editorial

Piergiorgio Valente, President of the CFE

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CFE OFFICE

Avenue de Tervueren 188A 1150 Brussels Belgium

Tel. +32 2 761 00 91

Email info@taxadviserseurope.org

Twitter @cfe_brussels

Website www.taxadviserseurope.org