

CFE CONNECT

2025 CFE TAX SYMPOSIUM



Highlights from the CFE Tax Symposium | 18 September, Ghent

CFE and the Belgian Institute for Tax Advisors and Accountants (ITAA) were pleased to welcome speakers, policymakers and tax professionals to the 2025 CFE Tax Symposium in Ghent. This year's theme, "Taxation in Transition: Compliance, Rights & Innovation in a High-Data World", addressed the real-world implications of evolving EU and global tax frameworks.



◆ Panel 1 – Tax Policy in Transition

Moderated by Aleksandar Ivanovski (CFE), the panel featured Benjamin Angel (European Commission), Félicie Bonnet (OECD), Jorge Ferreras Gutiérrez (Spain), Prof. Georg Kofler (WU Vienna), and Helen Pahapill (Estonia). The panel discussed legal issues of extraterritorial UTPR, EU-US divergence on blending methods, the need to preserve Pillar Two's minimum floor & priorities for simplification.

◆ Panel 2 – DAC & Taxpayer Rights

Eduardo Gracia Espinar (Ashurst) moderated this session with Reinhard Biebel (DG TAXUD), Raluca Enache (KPMG) and Philippe Vanclooster (ITAA). The Commission presented plans to consolidate DAC1-9 into a single legal instrument (DAC10), streamline duplicative reporting (e.g., DAC6 vs Pillar Two returns), and address persistent IT and matching issues. Speakers advocated a de minimis threshold, a whitelist for low-risk transactions, and to clarify hallmarks. The panel also cautioned against unintended impacts of pre-populated returns.

◆ Panel 3 – AI Technology in Tax Compliance

Moderated by Jeremy Woolf (Pump Court), this panel featured Jane Mellor (CIOT), Nicolas Devillers (BDO Luxembourg) and Petra Pospíšilová (Czech Chamber of Tax Advisers). The discussion focused on AI in tax workflows, human-in-the-loop safeguards, ethical risks and professional oversight. Speakers agreed that while structured data and automation are essential for VAT and indirect tax compliance, robust tooling, clear expectations and regulatory guidance are needed to avoid burden-shifting and protect client confidentiality.

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TAX POLICY DEVELOPMENTS



Key Global & EU Tax Developments

OECD Updates BEPS Action 5 Transparency Framework

The OECD revised the BEPS Action 5 minimum standard on tax ruling exchanges, introducing updated terms of reference and a new peer review methodology to apply from 2026. A revised XML Schema and user guide for spontaneous exchanges was also published, with new requirements taking effect from January 2027.

Trump Announces 100% Tariffs on Branded Pharmaceuticals

President Trump announced a 100% tariff on imported branded pharmaceuticals effective 1 October, unless manufacturers are building US production facilities. While EU exports may be shielded by a prior tariff agreement, concern remains in the UK and Switzerland.

ViDA Roadmap Published

The EU Commission released its implementation plan for the ViDA package, detailing key milestones between 2026 and 2035. The roadmap covers digital reporting requirements, single VAT registration, and platform VAT rules.

OECD Reviews Country-by-Country Reporting Implementation

The OECD released the 2025 peer review on CbCR implementation across 141 jurisdictions. Most countries now meet core requirements, but gaps remain in timely and complete exchange. The report calls for better use of CbC data for risk analysis and transfer pricing.

FISC Hearing on US Tax Shifts & Pillar Two Alignment

The EU Parliament FISC Subcommittee held a hearing on the implications of recent US tax developments. DG TAXUD, OECD, EU Tax Observatory and academic experts highlighted technical and policy differences between the US and EU regimes, the challenges of establishing safe harbours, and the impact of global tax divergence on EU competitiveness.

EU Fines Google €2.95 Billion Over AdTech Practices

The European Commission fined Google €2.95 billion for favouring its own ad exchange, AdX, in breach of EU competition rules. The Commission found that Google's ad server and tools unfairly advantaged AdX, harming rivals and distorting the online advertising market. Google must propose remedies within 60 days or face stronger measures. The decision drew criticism from former US President Trump.

ECON Committee Adopts BEFIT Position

The ECON Committee adopted its position on the Commission's BEFIT proposal, supporting harmonisation of the corporate tax base for large groups. MEPs introduced measures including a "significant economic presence" rule and restrictions on loss offsetting and royalties to low-tax jurisdictions. The file will proceed to plenary vote in November.

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TECHNICAL PUBLICATIONS

CFE Opinion Statement on 28th Regime for Start-ups & Scale-ups

CFE Tax Advisers Europe has submitted an Opinion Statement in response to the European Commission's consultation on the creation of a "28th Regime" – a simplified EU legal form intended to facilitate cross-border growth for start-ups and scale-ups.

CFE strongly supports the objective of creating a streamlined EU-wide corporate structure, but stresses that meaningful tax simplification must form a core part of the initiative if it is to succeed.

Drawing lessons from the limited uptake of the *Societas Europaea*, the CFE submission highlights that without harmonised tax rules and coordinated compliance measures, a new entity form will not deliver sufficient value to smaller businesses.

Key Recommendations

CFE identifies key tax-related barriers to cross-border scaling, including inconsistent access to tax incentives, divergent transfer pricing rules, and duplicative reporting obligations. The Opinion further urges the Commission to integrate tax and corporate law reforms in parallel, ensuring the new regime provides a genuinely practical, low-burden route.

CFE proposes targeted simplification measures, such as:

- A single EU tax filing interface;
- Harmonised documentation standards;
- Safe harbours for transfer pricing;
- Coordinated R&D incentives and startup-friendly loss relief;
- Clear guidance on State aid compatibility.

The submission further recommends alignment with the EU's digital agenda, leveraging tools such as the EU Company Certificate and European Business Wallet.

CFE concludes that the 28th Regime should focus on practical simplification and coherence, rather than simply creating another legal form. In this way, the regime could become a meaningful instrument to support innovation, competitiveness, and scale-up growth in the Single Market.

STAKEHOLDER CONSULTATIONS

EU Digital Omnibus Simplification Consultation

The European Commission has launched a call for evidence on the Digital Omnibus initiative, part of its broader simplification agenda. The proposal aims to streamline rules across EU digital legislation—including data governance, cybersecurity, and AI frameworks—to reduce compliance burdens. Legislative proposals are expected in Q4 2025.