



IAFEI Weekly Update

Knowledge, Resources, News, and Announcements

This is an issue of IAFEI Weekly Update for the week of November 4, 2024.

Valued All IAFEI Board members, ExCom members & Advisory Committee members:

The following interesting articles and useful information await you in this issue. I hope you enjoy reading them.

My special thanks to Conchita (CLM) , Piergiorgio (PGV) , JACFO, and Taga san (NTA) for their contributions.

I would like to make special mention in this issue of **IAFEI DAY 2024**, which was held in **Tokyo** on Friday, October 25th. The event was a great success. I would like to take this opportunity to thank Mr. Yaguchi and his team at JACFO for their hard work in preparing for and organizing the event.

I also would like to express my thanks to all the participants from FINEX, VCFO and FEI Chinese Taiwan who supported the event as well as the video message from CACFO.

Please feel free to circulate this Weekly Update within your organization. I am hoping that this Weekly Update may increase the value of IAFEI membership. If you have any suggestions, or recommendations, or would like to participate to provide articles, please do not hesitate to contact me.

Thank you for your continuous support and I would love to hear from you.

Tsutomu Mannari (TMA)
Chairman of IAFEI

(Total 18 pages)

Upcoming Events

Date	Time	Event
November 2024	TBC	OTC: Sustainability / ESG

You are welcome to visit our **official website** www.iafei.org

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■ 00 IAFEI DAY in Tokyo | Impressions | October 25, 2024

Herewith we would like to share the presentation materials, photos and audio files from the event.

- ✓ [Lecture Materials >>>](#)
- ✓ [Photos >>>](#)
- ✓ [Audio File >>>](#)

The photos are on a Google album. So, everybody is encouraged to upload her or his own photos there.

(↑ Contributed by JACFO)

■ 01 **BUSINESSEUROPE** | Headlines | October 10, 2024 **Europe's competitiveness challenge: Discussion with Belgian CEOs**

Our President Fredrik Persson and Director General Markus J. Beyrer participated in the Strategic Committee meeting of our Belgian member federation, VBO-FEB, on 8 October. "Europe, we have a competitiveness problem" – was a shared urgent message. (... ..)

[Read the Article >>>](#)

(↑ Contributed by PGV)

■ 02 **CFE tax advisers europe** | CFE's Tax Top 5 | BRUSSELS | October 14, 2024 **EU's path to decarbonising without deindustrialising**

- ECOFIN: Council of the EU Updates List of Non-Cooperative Jurisdictions for Tax Purposes
- FISC Subcommittee to Hold Exchange of Views with Vestager on Apple State Aid Case
- EU Council Approves EU Position on UN Framework Convention on Tax Cooperation
- EU Parliament Public Hearing on Tax Simplification & Transparency
- CFE Opinion Statement in Apple State Aid Case - Commission v Ireland, C-465/20

[Read More>>>](#)

(↑ Contributed by PGV)

■ 03 **OECD** | Newsletter | October 17, 2024 **What's new from the OECD in international tax matters?**

- Celebrating a decade of global efforts against tax crimes at the OECD Academy for Tax and Financial Crime Investigation
- Upcoming report launch: Tobacco Taxation in Latin America and the Caribbean - key insights and expert recommendations
- Understanding tax arbitrage strategies through closely held businesses
- New signatory of the Multilateral Convention on Mutual Administrative Assistance in Tax Matters
- New translations available: 15 years of the OECD's tax and development journey

[Read the Articles Online >>>](#)

(↑ Contributed by NTA)

■ 04 **ACCOUNTANCY EUROPE.** | Sustainability Update | October 2024

Highlights

- European Commission urges 17 Member States to fully transpose CSRD
- Council adopts COP29 conclusions, calls for enhanced climate investment
- CEAOB issues guidelines on limited assurance
- IAASB approves its global sustainability assurance standard

[Read the Articles Online >>>](#)

(↑ Contributed by TMA)

■ 05 **ecoDa** | Event Information | **ecoDa and Forvis Mazars Webinar |** **13 November 2024 | 16:00 - 17:30 CET**

How do Corporate Governance frameworks influence the quality of corporate reporting in Europe? Are there some systems that are more efficient than others?

[Read More and Register Today >>>](#)

(↑ Contributed by CLM)

■ 06 **United Nations University** | INSIGHTS | September 2024 EDITION **Summit of the Future: Advancing Global Governance**

UNU-CPR contributed critical research and policy insights at the United Nations Summit of the Future (22–23 September 2024), where global leaders met to consider multilateral solutions for a better tomorrow. Key outcomes included a Global Digital Compact for artificial intelligence and digital governance, a Declaration on Future Generations and renewed commitments to “beyond-GDP” measures — initiatives aimed to accelerate progress toward achieving the 2030 Sustainable Development Goals (SDGs).

[Read More >>>](#)

(↑ Contributed by PGV)

■ 07 **ICC Italia** | ICC Tax Digest | Issue 3 | September 2024 **by the Taxation Commission of ICC Italia**

Contributions by the following Members of the Commission:

Avv. Stefano Carmini (Carmini Avvocati Associati)

Avv. Paolo de’ Capitani di Vimercate (Studio Uckmar Associazione Professionale), Chair of the Commission

Dott. Alberto Pluviano (Fieldfisher)

In this number:

- Tax regime of capital gains on sale of qualified shareholdings made by non-residents
- Foreign source dividends and Double-Taxation Conventions
- Indirect taxation due by the sole corporate shareholder for the assets of a dissolving entity
- Cost basis of the shares of non-resident companies acquired by inheritance
- Income taxation and severance payment under art. 15 of Bilateral Convention against double taxation
- OECD Pillar One – Amount B Implementation Status

[Read More Online >>>](#)

(↑ Contributed by PGV)

■ 08 CFE tax advisers europe | Opinion Statement | October 2024

The CFE ECJ Task Force has issued an Opinion Statement on the decision in the Commission v Ireland ("Apple") case, C-465/20, in which the Court of Justice of the EU (Grand Chamber) delivered its decision on 10 September 2024.

The Apple case concerns the question of whether tax rulings issued by the Irish tax administration to Irish incorporated but non-resident companies that form part of the Apple Group are compatible with EU rules on State aid and, in particular, if the General Court's holding that the Commission had failed to prove to the required standard that such aid had indeed been granted, was legally correct.
(... ...)

[Read More >>>](#)

(↑ Contributed by PGV)

■ 09 EECS European Economic and Social Committee | 2024 EESC opinion on "Business in Europe: Framework for Income Taxation (BEFIT)" | Avis du CESE sur les "Entreprises en Europe: cadre pour l'imposition des revenus (BEFIT)"

At its 587h plenary session, held on 24 and 25 April 2024, the European Economic and Social Committee (EESC) adopted an opinion on "Business in Europe: **Framework for Income Taxation (BEFIT)**".

[Read More >>>](#)

(↑ Contributed by PGV)

BUSINESSEUROPE | Headlines | October 10, 2024

Europe's competitiveness challenge: Discussion with Belgian CEOs

Our President Fredrik Persson and Director General Markus J. Beyrer participated in the Strategic Committee meeting of our Belgian member federation, VBO-FEB, on 8 October. "Europe, we have a competitiveness problem" – was a shared urgent message.



President Persson highlighted the pressing need for Europe to address deep-rooted structural issues that have weakened its economic position. Over the past 30 years, the EU's GDP has lagged behind that of the USA, with European productivity growing at only half the pace of the USA and key Asian countries. From 2019 to 2021, foreign direct investment (FDI) into Europe dropped by two-thirds, while the USA saw a corresponding rise.

He pointed out the structural European reasons for this growing disparity, mainly: high energy bills and a high regulatory burden. To address these challenges, Persson outlined five key priorities for action: affordable energy, smarter and reduced regulation, a more integrated Single Market, improved technology and talent development, and an ambitious trade policy. "These priorities are crucial to putting Europe back on the path to long-term competitiveness and economic growth", he emphasised.

(URL of the original article: <https://mailchi.mp/businesseurope/headlines-discussion-with-belgian-ceos-eu-china?e=89142c14c6>)

CFE tax advisers europe | CFE's Tax Top 5 | BRUSSELS | October 14, 2024

EU's path to decarbonising without deindustrialising



BRUSSELS | 14 OCTOBER 2024

ECOFIN: Council of the EU Updates List of Non-Cooperative Jurisdictions for Tax Purposes

Economic and Finance Ministers updated the list of non-cooperative tax jurisdictions at the EU Council ECOFIN meeting held last week. The EU Council removed Antigua and Barbuda from the so-called Blacklist, leaving 11 jurisdictions on the list, namely: American Samoa, Anguilla, Fiji, Guam, Palau, Panama, Russia, Samoa, Trinidad and Tobago, the US Virgin Islands, and Vanuatu.

Antigua and Barbuda was added to the list in October 2023 after an unfavourable OECD Global Forum review on exchange of information. However, recent legal reforms led to a supplementary review. Notably, Fiji and Palau have made progress toward compliance with EU listing criteria. Meanwhile, the Council approved its regular "state of play" document (Annex II), which tracks cooperation with jurisdictions working toward tax reform. Armenia and Malaysia have fulfilled commitments and will be removed from the state of play, while Vietnam has been granted additional time to meet country-by-country reporting standards, with reassessment set for February 2025.

In response to the removal of Antigua and Barbuda, Pascuale Tridico (GUE, IT), new Chair of the FISC Subcommittee on Tax Matters expressed concern over the decision in a press release, stating that delisting should occur only after tax reforms are fully implemented, not merely based on commitments. He also criticised past removals of jurisdictions like the Cayman Islands and Bermuda for accepting minimal compliance measures. Tridico called for enhanced listing criteria, a stronger role for the European Parliament to ensure transparency, and efforts to address tax havens within the EU itself.

FISC Subcommittee to Hold Exchange of Views with Vestager on Apple State Aid Case

The EU Parliament's Subcommittee on Tax Matters will hold an exchange of views with Margrethe Vestager, Executive Vice-President of the European Commission, overseeing Europe's Digital Age strategy and competition policy. The session will take place from from 10:30 to 11:30am on 16 October, and will centre around the recent ruling by the Court of Justice of the European Union (CJEU) on the Apple State aid case in Ireland.

The CJEU's decision, delivered on 10 September 2024, upheld the European Commission's 2016 ruling that Ireland provided Apple with illegal State aid through €13 billion in tax breaks,

concluding a decade-long dispute. The CJEU upheld the EC's original conclusion that Apple had received a selective advantage, and that Ireland's tax rulings constituted illegal State aid by lowering Apple's tax liability in a way that provided Apple with an advantage over other companies in a similar factual and legal situation. The CJEU also rejected Apple's and Ireland's claims regarding procedural breaches, legal certainty, and Ireland's fiscal autonomy, thereby endorsing the EC's original decision of 2016 in full.

The implications of this ruling will be explored during the exchange of views, in the context of combating aggressive tax planning and ensuring equitable taxation for all businesses.

EU Council Approves EU Position on UN Framework Convention on Tax Cooperation

At the ECOFIN meeting last week, the EU Council approved the EU's position regarding the draft terms for a UN Framework Convention on international tax cooperation, prepared prior to the 79th session of the UN General Assembly held in September. While supporting the initiative, the EU and its Member States raised key concerns. They advocate for a consensus-based decision-making process, emphasising that this approach is essential for the inclusivity and effectiveness of the Framework Convention.

The EU also stressed the need for high-level commitments within the Convention, ensuring taxpayers' rights and safeguards are adequately addressed. Additionally, the EU seeks further analysis on substantive areas for future protocols to ensure stability in the international tax architecture.

Another critical point for the EU is ensuring the Convention complements ongoing efforts in other international tax forums, advocating for coherence and alignment to promote widespread participation and implementation.

The EU calls for transparency and a balanced process to ensure the Framework Convention reflects the interests of all UN member states, and foster greater collaboration, global acceptance, and long-term success in strengthening international tax cooperation.

If adopted, the terms of reference provide for the framework convention on a new tax treaty to be developed by 2027. The UN treaty would need to be adopted by the General Assembly, after which it would be opened for signature and ratification to all member states.

EU Parliament Public Hearing on Tax Simplification & Transparency

On 17 October 2024, from 9:00 to 10:30am, the EU Parliament will hold a public hearing on "Simplification and Transparency: The Role of Simplified Tax Policy in Encouraging Growth, Job Creation, Competitiveness, and Cross-Border Business in the EU."

The discussion comes in response to growing concerns about compliance costs and administrative burdens. Recent reports by Enrico Letta and Mario Draghi have renewed the debate on boosting the EU's competitiveness post-COVID and amid the economic impact of the war in Ukraine.

Speakers at the FISC hearing include: Prof. Dr. Eva Eberhartinger, Full Professor and Chair in Business Taxation (Betriebswirtschaftliche Steuerlehre) at the Department of Finance, Accounting, and Statistics at WU, Vienna University of Economics and Business; Prof. Dr. Christiana HJI Panayi,

Professor in Tax Law at Queen Mary University of London; and, Dr Panayiotis Nicolaidis, Director of Research at EU Tax Observatory Paris School of Economics.

The hearing will explore how simplifying tax compliance and reducing administrative costs for both taxpayers and governments can foster cross-border business, enhance competitiveness, and drive job creation and economic growth across the EU.

CFE Opinion Statement in Apple State Aid Case - *Commission v Ireland*, C-465/20

CFE Tax Advisers Europe's ECJ TaskForce has issued an [Opinion Statement](#) on the decision in the *Commission v Ireland* ("*Apple*") case, C-465/20, in which the Court of Justice of the EU (Grand Chamber) delivered its decision on 10 September 2024.

The *Apple* case concerns the question of whether tax rulings issued by the Irish tax administration to Irish incorporated but non-resident companies that form part of the Apple Group are compatible with EU rules on State aid and, in particular, if the General Court's holding that the Commission had failed to prove to the required standard that such aid had indeed been granted, was legally correct.

The Court set aside the General Court judgment of 15 July 2020, which had annulled the European Commission findings of State aid. The CJEU's Grand Chamber found that the General Court made errors in its understanding of the Commission's decision that led it to wrongly conclude that the Commission had failed to demonstrate that the tax rulings led to favourable tax treatment of the non-resident entities in comparison to non-integrated standalone companies and other companies dealing at arm's length. In reaching this result, the Grand Chamber judgment follows the Opinion of AG Pitruzzella delivered on 9 November 2023. Rather than referring the case back to the General Court for reconsideration, as the AG had recommended, the Court decided to render a final judgment on the validity of the Commission decision, reinstating it in full.

The CFE Opinion Statement seeks to explain and analyse the CJEU's reasoning both with respect to the annulment of the General Court's judgment and its final ruling on the granting of illegal state aid to the Apple Group. CFE Tax Advisers Europe welcomes the CJEU's decision to give a final judgment in the case to prevent a prolonged uncertainty over the outcome. It wonders, however, how the judgment fits with recent case law of the Court, which had shown more deference to Member States' interpretation of their law in assessing derogations from 'normal taxation' in specific cases.

The CFE wonders whether the judgment's outcome, insofar as it sits in tension to holdings in its earlier judgments in *Fiat* and *Engie*, and the later judgment in *UK CFC* might be considered as specific to the circumstances of the procedure. In particular, this relates to the fact that the CJEU did not review the findings of the General Court it had rejected in that judgment but, in the absence of a cross-appeal by Ireland or Apple, had considered *res judicata* in this decision. In light of these considerations, the CFE expects the Court will clarify the status of its judgment in this case and its previous case law in future decisions.

The CFE ECJ Task Force is formed by CFE Tax Advisers Europe and its members are Georg Kofler (Chair of this Task Force and Professor at the Institute for Austrian and International Tax Law of WU Wien), Alfredo Garcia Prats (Professor at the University of Valencia), Werner Haslehner (Professor at the University of Luxembourg), Aleksandar Ivanovski (Director of Tax Policy at CFE Tax Advisers Europe, *ad hoc* member in 2024), Eric Kemmeren (Professor of International Taxation and International Tax Law at the Fiscal Institute Tilburg of Tilburg University), Michael Lang (Professor at

the Institute for Austrian and International Tax Law of WU Wien), João Nogueira (Professor at Universidade Católica Portuguesa and Deputy Academic Chairman at IBFD), Christiana HJI Panayi (Professor at Queen Mary University of London), Stella Raventós-Calvo (Vice-President of CFE Tax Advisers Europe), Isabelle Richelle (Co-Chair of the Tax Institute - HEC - University of Liège, Brussels Bar Elegis), and Alexander Rust (Professor at the Institute for Austrian and International Tax Law of WU Wien).

We invite you to read the [Opinion Statement](#) and remain available for any queries you may have.

The selection of the remitted material has been prepared by:
Aleksandar Ivanovski & Brodie McIntosh

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(Reposted from: email newsletter, October 14, 2024, CFE tax advisers europe info@taxadviserseurope.org)

ecoDa- European Confederation of Directors Associations



ecoDa and Forvis Mazars Webinar | 13 November 2024 | 16:00 - 17:30 CET

Register today!

How do Corporate Governance frameworks influence the quality of corporate reporting in Europe? Are there some systems that are more efficient than others?

A webinar by ecoDa and Forvis Mazars

WEBINAR ON CORPORATE REPORTING AND CORPORATE GOVERNANCE:

HOW DO CORPORATE GOVERNANCE FRAMEWORKS INFLUENCE THE QUALITY OF CORPORATE REPORTING IN EUROPE? ARE THERE SOME SYSTEMS THAT ARE MORE EFFICIENT THAN OTHERS?

Webinar, 13 November, 16-17.30 CET



Corporate reporting is pivotal to financial stability and investor protection. From 2024 on, in addition to financial statements, corporate reporting includes sustainability information, as companies are required to disclose – and get an assurance on – ESG information. Corporate governance plays a decisive role in ensuring the robustness and reliability of corporate reporting, along with statutory audit and supervision. But in the EU, there are almost as many corporate governance frameworks as Member States, given that corporate governance codes reflect the diversity of cultural and economic backgrounds and practices.

ecoDa and Forvis Mazars' experts, [David Herbinet](#) Head of Audit & Assurance at Forvis Mazars, [Anne-Hélène Monseletto](#), Independent board member and [David Risser](#), Managing Director at Morrow Sodali will address key questions regarding Corporate Reporting and Corporate Governance:

- Is the diversity of corporate governance frameworks across the Member States an obstacle to improve corporate reporting quality and reduce its costs at EU level?
- In the context of the expanding scope of corporate reporting on the one hand and of the new Commission's call for reducing reporting burdens and costs for companies on the other, what are the levers to ensure the quality and consistency of corporate reporting across the EU? How do Corporate Governance frameworks influence the quality of corporate reporting in Europe? Are there some systems that are more efficient than others?
- Are there emerging best practices that enhance internal control and internal audit for more qualitative corporate reporting?

Register now to what promises to be a fruitful discussion on the latest trends and concerns on corporate reporting and corporate governance!

[Register here!](#)

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Our mailing address is:

Contact@ecoDa.eu

(Reposted from: email newsletter, October 21, 2024, ecoDa, Contact@ecoDa.eu)

United Nations University | INSIGHTS | September 2024 EDITION

Summit of the Future: Advancing Global Governance

UNU-CPR contributed critical research and policy insights at the United Nations Summit of the Future (22–23 September 2024), where global leaders met to consider multilateral solutions for a better tomorrow. Key outcomes included a *Global Digital Compact* for artificial intelligence and digital governance, a *Declaration on Future Generations* and renewed commitments to “beyond-GDP” measures — initiatives aimed to accelerate progress toward achieving the 2030 Sustainable Development Goals (SDGs).

[READ MORE »](#)

Welcome to the September 2024 edition of the INSIGHTS newsletter.

This month, we highlight the significance of the UN Summit of the Future and its key outcomes; explore the potentially transformative role of artificial intelligence for climate governance and disaster preparedness; consider the UNGA’s critical role in addressing climate challenges; examine how equitable taxation can help reduce poverty; and offer insights on gender representation in water issues and migration policies. We also feature an academic opportunity and upcoming events.

Miss an edition of INSIGHTS? [Visit the archive.](#)

A Global Learning Space for Sustainable Development

This article in *University World News* highlights the global impact of Regional Centres of Expertise (RCEs) on Education for Sustainable Development. The global network of 190 RCEs, for which UNU-IAS acts as secretariat, unites local stakeholders to advance the SDGs through education and collaborative action on innovative solutions to regional challenges.

[READ MORE »](#)

The UN General Assembly and Environmental Leadership

As a platform for international cooperation, the United Nations General Assembly (UNGA) plays a critical role in advancing climate action and shaping policies for a sustainable future. This UNU-EHS website article highlights the role and significance of the UNGA in tackling global climate and environmental challenges.

[READ MORE »](#)

Five Reasons to Care About the Summit of the Future

This article from UNU-INWEH, published on Forbes.com, explains why the Summit of the Future matters for everyone. From reshaping global governance to addressing pressing challenges like

climate change and inequality, the outcomes of this summit will influence key international policies that will impact people and the planet for years to come.

[READ MORE »](#)

Aligning AI and Climate Governance

This UNU-EHS website article emphasizes the growing importance of aligning artificial intelligence (AI) with climate governance. Proper integration of AI into climate policy frameworks holds the potential to accelerate action on climate change, enhance decision-making and ensure that technology supports rather than undermines sustainability goals.

[READ MORE »](#)

Making Children Visible

Reflecting on the concept of "evolving capacity," this UNU-MERIT website article shares important insights based on research around access to justice for children. It highlights the need to recognize and support children's growing autonomy and explores the critical importance of children's right to be heard in shaping policies that affect their lives.

[READ MORE »](#)

The Role of AI in Disaster Preparedness

From enhancing real-time data analysis to improving predictive capabilities, artificial intelligence (AI) can facilitate more accurate and timely responses to disasters, ultimately saving lives and reducing the impact of crises worldwide. This UNU-EHS website article highlights five innovative ways that AI is reshaping the future of disaster preparedness and global resilience.

[READ MORE »](#)

Addressing the Gender Gap in the Water Workforce

An article in *Nature Water* by UNU researchers highlights the persistent challenges that women face within the global water workforce. The authors warn that despite efforts to promote gender equality, women remain significantly underrepresented in this crucial sector, particularly in leadership and decision-making roles.

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UN-EGOV Contributes to UN E-Government Survey

UNU-EGOV played a pivotal role in producing the landmark *UN E-Government Survey 2024*, particularly by driving the Local Online Service Index. The work of UNU-EGOV demonstrates the potential of targeted interventions to bridge the digital divide and advance sustainable development goals through digital government.

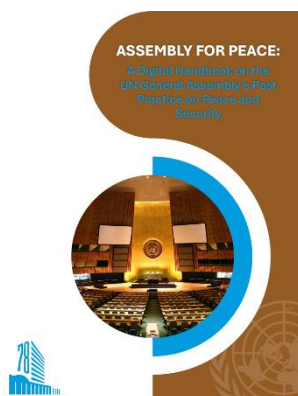
[READ MORE »](#)



UNU-IAS at the 2024 UN Biodiversity Conference

UNU-IAS will co-organize three official side events and one Green Zone event at the 2024 UN Biodiversity Conference in late October. These sessions will focus on tackling urgent biodiversity challenges, fostering dialogue on sustainable ecosystem management and exploring innovative conservation strategies to support global biodiversity goals.

[READ MORE »](#)



The UN General Assembly's Role in Peace and Security

UNU-CPR has released a digital handbook that reviews the UN General Assembly's past practices in promoting peace and security. The report offers key insights into how the General Assembly has addressed global conflicts and security challenges, while exploring innovative solutions for strengthening multilateral peace efforts in the digital age.

[GET HANDBOOK »](#)

An Assessment of Local SDG Monitoring

This UNU-CRIS working paper provides a comprehensive review of current literature on local SDG monitoring, highlighting key challenges, gaps and opportunities. It offers valuable insights for policymakers and researchers aiming to enhance local efforts in tracking progress towards achieving the SDGs.

[GET WORKING PAPER »](#)

Aligning Policies for Global Land Sustainability

This UNU-EHS policy brief presents strategies for achieving Land Degradation Neutrality by aligning global policies and frameworks. It emphasizes the need for coordinated action across sectors to prevent land degradation, restore ecosystems and enhance resilience, and highlights the role of sustainable land management and policy coherence in meeting the SDGs and ensuring long-term environmental sustainability.

[GET POLICY BRIEF »](#)

ACADEMIC & LEARNING OPPORTUNITY

Joint Master's Programme in Geography of Environmental Risks and Human Security

UNU-EHS and the University of Bonn are accepting applications for their interdisciplinary Joint Master's Programme that equips students with the skills to analyze and address complex environmental risks and human security challenges through a unique blend of theoretical knowledge and practical experience. The application deadline is **15 December**.

[APPLY NOW »](#)

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(Reposted from: email newsletter, United Nations University, INSIGHTS, October 16, 2024)

CFE tax advisers europe | Opinion Statement | October 2024



Dear Sir/Madam,

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CFE Tax Advisers Europe wonders whether the judgment's outcome, insofar as it sits in tension to holdings in its earlier judgments in *Fiat* and *Engie*, and the later

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We invite you to read the [Opinion Statement](#) and remain available for any queries you may have.

Kind regards,

The Office Team at CFE Tax Advisers Europe

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EECS European Economic and Social Committee | 2024

EESC opinion on "Business in Europe: Framework for Income Taxation (BEFIT)" | Avis du CESE sur les "Entreprises en Europe: cadre pour l'imposition des revenus (BEFIT)"



At its 587th plenary session, held on 24 and 25 April 2024, the European Economic and Social Committee (EESC) adopted an opinion on "Business in Europe: **Framework for Income Taxation (BEFIT)**".

The EESC supports the Commission's decision to propose BEFIT/Transfer Pricing through an EU directive, as the current variety of different national rules results in fragmentation and discrepancies, hindering cross-border activities on the internal market due to the high costs that companies incur to comply with multiple legal frameworks. The Committee notes that, pursuant to Article 48(2) of the BEFIT proposal, Member States will be entitled to add tax base increases, tax deductions or tax incentives to their allocated parts. While the EESC acknowledges the value of allowing Member States room for manoeuvre, such flexibility could come at odds with the Commission objective of reducing the compliance costs weighing on companies.

The EESC opinion is available in all official EU languages, its key points and other related documents can be consulted via this link:

➤ [Business in Europe: Framework for Income Taxation \(BEFIT\)](#)

Yours sincerely,

Ioannis VARDAKASTANIS
President of the ECO Section