



Summary Record

Thursday 28 October 2021 | 14.00 - 17.00 CET
VIRTUAL MEETING

1. Welcome and Opening of the Meeting

Commission Chair, Christian Kaeser welcomed participants to the virtual meeting, noting broad participation of members from all around the globe.

Mr Kaeser paid tribute to Mukesh Butani, outgoing Vice-chair of the Taxation Commission and thanked him for his eleven years of service in his leadership role.

2. ICC Global Policy Department – strategic priorities 2021/2022

Andrew Wilson, Global Policy Director and Permanent Observer to the United Nations, provided an update on ICC's global policy strategic priorities for 2021/2022.

- It is important to deliver high quality distinctive content, including rules and standards, guidelines for business or public policy advocacy. The goal is to ensure that Commissions are effectively structured and well governed with a clear remit, in an effort to mobilise ICC's network for maximum engagement.
- Mr Wilson recognised the great level of engagement from members of the Taxation Commission, and the delivery of quality value-add content, which has been influential in the context of engagement with the OECD, UN, EU and BRITACOM.
- Effective collaboration between Commissions on cross-cutting issues is also key. Mr Wilson thanked members for their valuable contributions in the joint working group with the Environment and Energy Commission in developing the ICC Carbon Pricing Principles, which will form the bedrock of ICC's engagement at COP26.
- Mr Wilson congratulated the Commission for its continued engagement, with the hope for future opportunities to collaborate with other Commissions to drive forward key international discussions.

3. BRITACOM and the Belt and Road Initiative (BRI)

Commission Chair, Christian Kaeser provided members with an update regarding ICC's engagement with the Belt and Road Initiative Tax Administration Co-operation Forum, including the recent Business and Industry Tax Dialogue, held in the context of the second BRITACOM in September this year. ICC had the privilege to host the Business and Industry Dialogue, with the opportunity to build on the updated ICC report on digitalisation of tax administrations. The session provided for a constructive discussion on the topic with representatives from tax administrations, academia, business and the International Tax and Investment Centre.

Suhua Huang, Deputy Director General, International Taxation Department, Acting Executive Secretary of BRITACOM, State Taxation Administration, People's Republic of China, presented further developments on BRITACOM and its commitment to the establishment of long-term taxation co-operation for participants of the BRI as well as an update regarding the second BRITACOF.

- The first Wuzhen Action Plan 2019 - 2021 served as the initial technical road map for BRITACOM's work. Great efforts were made by the individual Task Forces to produce final working reports on the following priority areas:
 1. Tax certainty;
 2. Tax compliance;
 3. Digitalisation;

- 4. Dispute resolution;
- 5. Capacity Building.

- The reports summarise the achievements for each of the five priority areas for tax administration. The development of the reports marks one of the milestone indicators of the Wuzhen Action Plan.
- The Secretariat has commenced drafting the second Action Plan (2022-2024). Based on extensive consultations, a consensus has emerged that BRITACOM members expect an action plan which is narrow in scope but provides for in-depth study. This could include a follow up study on existing topics for further development, or new topics.
- The goal of the First Action Plan was to raise the profile of BRITACOM by leveraging various channels to disseminate existing work to help developing countries with respect to their tax administration.
- The second BRITACOF was held from 7-9 September and was hosted by the State Revenue Committee of the Ministry of Finance, Kazakhstan. The session features four topics, namely tax administration digitalisation, tax service digitalisation, new technologies in taxation, tax related data governance. Over 30 speakers provided insights for engaging discussion and information exchange on these topics.
- A joint statement of the second BRITACOF was released, which embedded the consensus achieved by all Council members and the plan for next steps which provides for enhanced co-operation by BRITACOM members in a more digitalised tax environment.
- Mr Huang recognised ICC's contributions to the work and discussions, including the high-value report produced on digitalisation of tax administrations. He specifically noted the reference to digitalisation as a holistic approach that incorporates six key components of a successful digital transformation: *compliance strategy; legislative framework; operational framework; tax technology and infrastructure; change management; and performance measurement*.
- The BRITACOM Secretariat also provided training events on topics such as dispute resolution, tax flow design and CBC reports, which included participation of more than 500 tax officials from more than 70 jurisdictions. Capacity-building in the form of workshops will be relevant to ensure comprehensive training and a certificate awarding package.

FOR ACTION:

- Provide global business perspectives to ongoing work within BRITACOM;
- BRITACOM will liaise with ICC regarding further opportunities for input and support.

4. OECD: Developments on taxation of the digitalised economy

Martin Kreienbaum, Director General of International Taxation at the German Federal Ministry of Finance, Chair of the OECD Committee on Fiscal Affairs and the Inclusive Framework on BEPS provided an update regarding the OECD Inclusive Framework agreement for a global solution to address the tax challenges of digitalisation.

- The historic agreement was established early in October, by 136 members of the Inclusive Framework on the key components of the Pillar One and Pillar Two package to address the tax challenges of digitalisation. The main features were agreed on in July and more recently on the details and implementation. The agreement sets a good signal for multilateralism, as the Inclusive Framework engaged a diverse group including developing and developed countries, large and small economies, financial hubs, tax agencies, etc. General consensus has been reached for the first time in history on material law and substantive tax law - on the distribution of taxing rights and a minimum level of taxation.

Pillar One

Building blocks:

- *Scope*: moved away from the Unified Approach and lowered thresholds, in-scope companies that exceed €20billion. The number of multinationals captured by Pillar One is relatively small compared to what was discussed last year.
- *Segmentation*: Considering the broader approach on Pillar One where individual business sectors are not considered, in principle, there is not much need for segmentation. Although in exceptional cases where a single segment in a multinational company would meet the conditions of the scope (e.g., €20 billion) but the MNEs would otherwise fall out of scope if they

do not reach the profitability threshold of 10% agreed on, then there would be segmentation. It is acknowledged that this is complicated and burdensome for companies.

- *Quantum*: 25% has been agreed as the middle ground between the 20% and 30% range outlined in July this year.
- *Revenue sourcing*: For component industries, it is difficult to identify where the end-market/end-consumer sits. On this note, further elaboration on the rules is needed, but the idea is to identify the market jurisdictions.
- *Nexus*: Market jurisdictions can benefit from Amount A. If there is more than €1 million turnover in that market jurisdiction, then the jurisdiction is entitled to benefit from Amount A and in the case of developing countries, it is defined by the GDP of the jurisdiction below €40 billion. In those cases, the threshold is lower – at €250,000.
- *Tax base*: determined on the basis of internationally accepted accounting rules.
- *Elimination of double taxation*: a very delicate point technically, but also politically. It is basically the question of ‘who is paying the bill’? Allocate Amount A to market jurisdictions and identify those jurisdictions/entities where double taxation would be eliminated. Consideration of concepts that would simply identify the jurisdiction, then it would be up to the jurisdiction to identify entities within that jurisdiction and where and how the double taxation would be avoided.
- *Marketing and distribution safe harbor*: a concept that would avoid double counting – a jurisdiction that would already, under the existing international tax rules, benefit from the profits of an MNE because there is a subsidiary/PE in that jurisdiction, would not be entitled again. Therefore, rules have been developed to avoid the double counting so a jurisdiction would not benefit twice from the same income.
- *Amount B*: about setting fixed transfer pricing to routine marketing and distribution functions – all transfer pricing functions connected to Amount A.
- *Tax certainty*: this is in general coupled with dispute prevention and resolution and continues to play an important role - building trust in the accuracy and completeness of data. Binding dispute resolution is also a difficult question that has been discussed.
- *Implementation and administration*: the intention is to have everything implemented by the end of next year so that the rules can enter into effect as of January 1st, 2023.
- *Unilateral measures* - integration of this new system vis-à-vis existing unilateral measures at national and regional level. Questions arising regarding how to switch from DSTs and what the agreement means in practice. A mechanism was established by a group of countries, including USA, France, Italy, UK, Austria, and a few other countries, who released a statement on how they would integrate the new system and abolish the old one. The transition period is addressed in the paper, including the legal and political implications.

Pillar Two

- Minimum taxation is technically well advanced and politically accepted. Ireland, Estonia and Hungary have now joined the agreement, which is an important step, particularly for its implementation in Europe, through a Directive.
- Pillar Two mechanisms operate on the basis of two sets of rules: income inclusion rule (IIR) and the subject to tax rule (STTR). The IIR comes first and the STTR is a back-stop to make sure that the income would be taxed at the effective minimum tax level. The STTR will be given priority for the application of certain payments such as interest and royalties. There is an interest by developing countries to administer an easier rule – the STTR has been included with a defined scope and trigger rate at 9%.
- The effective tax rate (ETR) looks at the tax base, based on generally accepted and agreed accounting rules. The question of covered taxes – what taxes will be considered for the calculation of the ETR. The minimum tax rate has been agreed at a fixed rate of 15%, as opposed to “at least 15%”, determined in July.
- The carve-outs were discussed intensively, and the major difficulty revolved around the fact that when designing Pillar Two, substance was not considered, but instead the tax situation in a country. A number of countries believed substance and economic activity should be considered, which otherwise would limit tax competition. Finally, it was agreed on a limited, formulaic carve-out that would carve out income that is equivalent to 5% of the tangible assets and 5% of the payroll expenses. Also discussed was a transition period of 10 years.

- Timeline:

- Implementation is due in 2022 and the rules are expected to enter into force in 2023.
- Model rules for Pillar 2 expected in November 2021 and a first draft of the European Commission Directive at the beginning of 2022.
- By mid-2022 a multilateral convention developed by the OECD is expected, which will be open for signature next year.

Joint international tax conference

Commission member, Georg Geberth updated members on the 2021 joint ICC, Business@OECD and BusinessEurope international tax conference held on 12 July 2021, as well as future plans for the 2022 event.

The ITC Munich was held virtually on 12 July 2021, which was quite timely following the G20 Finance Ministers meeting days before and saw the participation of two representatives from OECD – Martin Kreienbaum and Achim Pross. The conference was structured on two panels related to Pillar One and Pillar Two. Overall, it was a great success with more than 1200 registrations for the event (the replay of the event is available [here](#)). The intention is to organise a hybrid conference next year, with the hope to have some in-person participation in Munich.

5. European Commission

Commission member, Krister Andersson updated members on tax-related developments within the European Commission including an overview of key priorities as well as ongoing discussions within the Platform for Tax Good Governance.

- The European Commission (EC) presented its Business Taxation for the 21st Century communication. Implementation of Pillar One and Pillar Two is the top priority for the EC at the moment, although focus will primarily be on Pillar Two, with a draft Directive expected by the 22nd of December. Consequently, the package will not be implemented at the same time. Pillar Two will need to be EU law compliant and the EC is considering making the IIR also applicable to purely domestic situations in Europe. That could be a concern for some countries, e.g., Estonia, which only has a corporate taxation upon distribution. At the same time, few companies have a turnover exceeding the threshold of €750 million. Within the EU, unanimity by member states is required for a Directive to go through – that would be greatly facilitated if it was a combined package.
- There are question marks at the European level on the implementation of Pillar One in the US. The €125 billion in connection with Amount A to some 2/3 would come from US companies to be allocated to market jurisdictions – many of them being European markets. The package concept is very important for acceptance and unanimity within the EU.
- From a business perspective, it is preferable to see the implementation at the same time across the globe and with the major players and economic regions of the globe.
- The EC has also brought up proposals considering a requirement for companies in scope to present the effective tax rate, which will be based on Pillar Two, but it is uncertain whether it will be at the unity level or if it will be on a jurisdictional level. It remains to be seen on how to require companies to present an effective tax rate. This requirement is already on top of existing Country-by-Country Reporting (CBCR) rules, and furthermore in the EU there is public CBCR, since the legal basis for the proposal was as an accounting directive rather than a tax one. Consequently, unanimity was not needed, and a qualified majority was reached. However, the new effective tax rate would cover only large companies, although there will still need to be an additional reporting requirement is not necessarily the same information as provided by the CBCR.
- An additional subject of discussion in the EU is related to the carbon border adjustment mechanism (CBAM) within the framework of the EC Fit for 55 package (55% of GHG emissions reduction by 2030). The CBAM raises concerns about the competitiveness of European businesses in export markets as well as concerns for developing countries. This is a real challenge - the mechanism should not result in trade barriers, and, at the same time, it is important to achieve an efficient reduction of CO2 emissions.
- Another topic of discussion is how to address shell entities - entities with a very low effective tax - and it. It is primarily directed at high-net worth individuals, and not companies, that use

mechanisms that are not transparent and may result in very low tax rates. There will be new mechanisms, including one introducing a self-reporting system, with 20,000 – 30,000 entities per year that will need to file according to these rules expected next year.

- The EC is also addressing the debt equity bias and early next year will present a proposal for a Debt-equity bias reduction allowance (DEBRA). It appears to be a very limited proposal at the corporate level rather than at the shareholder level, addressing the double taxation of equity financing compared to debt financing.
- The European Commission Platform for Tax Good Governance:
 - ICC and BusinessEurope are represented together with 27 Member States, as well as some NGOs. The most recent meeting was held on the 7th of October where ICC presented a paper on remote working abroad, highlighting the tax aspects that arise from cross-border teleworking. It raises issues on *how the worker should be taxed; social security contributions; pensions rates and, for businesses, whether a permanent establishment is created in the other country* – with profit shifting or transfer of taxation and profit to another country. The document was well received, and it is hoped that the EC and the OECD would work on this very important topic.
 - CFE Tax Advisors also presented a report on professional judgement in tax planning and an ethics quality bar for all tax advisors and are soliciting comments on the report.

6. Tax reform for remote working abroad

Commission member, Georg Geberth, elaborated further on the ICC discussion paper on tax reform for working abroad.

- As mentioned above, ICC was invited to present its paper on the topic at the Platform for Tax Good Governance meeting. The European Commission also provided a presentation on the topic but focused predominantly on the employee implications.
- ICC proposed a lean solution/suggestion related to tax issues for cross-border remote working, without addressing any social security issues, in order to simplify and narrow the approach and focus.
- Tax administrations are concerned about potential abusive situations for remote working abroad in the long term. ICC has therefore proposed solutions in a limited number of cases. The restrictions would be that the employer would continue to provide an office for the employee in the country of employment and then, under request of the employee, the employer decides to allow him/her to work in another country on a temporary basis (maximum 120 days per year).
- The tax consequence is that there is no fixed place of business, permanent establishment, dependent agent permanent establishment (DAPE), or place of effective management in the other country.
- A second request is that if another pandemic arises, the solution should be much broader considering that in those exceptional circumstances the period for cross-border remote working could extend beyond 120 days.
- Next steps:
This proposal was well-received and there was an expression for the EC to act swiftly on this issue. The next step will be to engage with the OECD.

7. Developments on indirect tax issues

Commission member Marlon van Amersfoort briefed members on developments on indirect tax issues as outlined in the document circulated to members in advance of the meeting.

- Recent VAT/other indirect tax developments across the globe
 - ICC is represented on the EU VAT Forum and the EU VAT Expert Group, which have held several meetings throughout the year. On the 8th of November, a plenary meeting will be held on administrative sanctions regarding VAT reporting. The working group on Administrative Sanctions is working to finalize its report on administrative sanctions across the EU. It is expected that the report should be published early 2022.
 - A new working group will deal with the implemented quick fixes with respect to specific areas (call-of-stock, the VAT identification number, proof of intra-EU transport, allocation

- of transport in supply chains). Members who have experience in this area were invited to share their views with the ICC Secretariat for onward submission to the working group.
- The digital economy, platforms and sharing economy remain hot topics, and the Commission recognizes the interlinked nature of the relevant proposals either already under consideration or introduced by the Tax Action Plan. One significant group of those action items is: “Package VAT in the digital age: update VAT rules for the sharing economy, move to a single EU VAT registration, modernize VAT reporting obligations and facilitate e-invoicing”. Regrettably, rules in respect of reporting obligations are not always harmonized.
- The one common factor is the financial burden placed on companies to invest in technology to comply with these complex obligations. The EC recognizes that this is a concerning issue, and addressing it is a key plank of the Action Plan.
- From 27-28 October, the EC is hosting the second virtual FISCALIS conference to discuss the recently circulated draft final report arising from its “VAT in the Digital Age” study.
- The final report proposes policy options in the three main areas: digital reporting requirements, VAT treatment of the platform economy, single EU VAT ID number.
- In the Middle East, Qatar and Kuwait still have to implement the VAT system. Saudi Arabia already implemented the VAT system but is still making changes regularly. In Asia Pacific region - the trend is that indirect tax is used for COVID-19-related recovery.
- Regular consultations are held with the Commission on Customs & Trade Facilitation Commission and input has also been provided to the Working Group on Carbon Pricing.

8. Cooperative compliance

Commission member Jeffrey Owens updated members on the work of the University of Vienna/ multistakeholder group on cooperative compliance, including the launch of the final report: [“Co-operative Compliance: A multi-stakeholder and sustainable approach to taxation”](#).

- ICC was an important partner and contributor for the work and final report.
- Many countries that have not implemented cooperative compliance are asking for the implementation guidelines.
- Since the launch of the Handbook a number of presentations have been provided targeting countries such as Zambia, Kenya, Nairobi, Algeria, South Africa – who had expressed interest.
- There is interest in expanding to Latin American and Asian countries for their engagement. For instance, Brazil is interested in putting a cooperative compliance programme in place. Other countries in the Latin American region include Peru and Honduras for support in terms of implementation.
- In Asia, Malaysia has made a commitment to put a cooperative compliance programme in place. There is also a certain amount of interest in Indonesia and the Philippines.
- Next steps
The group will monitor the way that countries and companies are using the guidance of the Handbook. Any support with implementation in countries will be welcome.

9. Transversal Projects

Updates were provided on transversal ICC projects of interest.

- Update from Anna Theeuwes, co-Chair of the ICC Working Group on Carbon Pricing Mechanisms, regarding the progress to develop a set of carbon pricing principles to be deployed within the context of COP26.
 - Ms Theeuwes celebrated the finalisation of the first deliverable of the WG – a comprehensive set of carbon pricing principles, which have been completed in time to be launched on the side-lines of COP26.
 - The principles are the result of a cross-Commission effort with members from the Environment & Energy Commission and the Taxation Commission.
 - With growing impetus by countries to consider carbon pricing mechanisms, there is a strong need for a consistent and coherent approach to carbon pricing to help reduce the risk of fragmentation, which increases challenges for businesses globally.
 - There is an opportunity to advance approaches on carbon pricing as well as achieve an agreement on effective and transparent rules for Article 6, particularly as governments lack

- specific guidance on the smart design of carbon pricing policies that support the real economy and incentivise enhanced climate action and ambition.
- The 10 principles could form an essential part of national and international approaches to climate change for the growing number of countries that decide to use carbon pricing instruments to reduce carbon emissions.
 - The principles will be launched during the first week of COP26 with a side event at the [ICC Make Climate Action Everyone's Business Forum](#).
 - Next steps
In the second phase, the WG will focus on the design features of carbon pricing mechanisms. An analysis of the present systems will be made in order to gather examples and formulate the best design features.
 - Update from Damien Bruckard, Deputy Director, ICC Commission on Trade and Investment, regarding a possible ICC contribution in response to EU proposals for a carbon border adjustment mechanism.
 - The ICC aims to explore the feasibility and desirability of putting together a position on CBAs and principles for their design.
 - In consideration of the EU's intention to create a CBAM to deal with carbon leakage, Mr Bruckard illustrated the main takeaways of the EU proposal:
 - It would cover imports to EU;
 - It would cover cement, steel, electricity, aluminium and fertilizers;
 - It would cover both simple and complex goods;
 - The level of adjustment will mirror the average auction of EU ETS allowances each week;
 - There will be a phase in period and only fully implemented in 2026.
 - The international reaction has been varied – G7 nations in June pledge cooperation on carbon pricing and carbon leakage, meanwhile the US and EU have outlined plans for a transatlantic alliance to develop clean technologies and said they would coordinate diplomatic efforts to convince other big emitters to cut CO2 faster. The Biden Administration might consider a border tax as part of the trade agenda.
 - Canada is also exploring the potential of a CBAM and has committed to discussing the idea with international partners.
 - There are few oppositions, from Australia, Belarus and the BRICS. More generally, governments are concerned about potential inconsistencies with WTO rules and there are speculations that the creation of a CBAM is unlikely to breach the non-discriminatory principle.
 - Mr Bruckard focused on the main three comments advanced by ICC:
 - In response to last year's Trade Policy Review: the complexity of designing and implementing such a mechanism has raised concerns for businesses outside of Europe. Namely, it is uncertain how to calculate the carbon content of goods produced in foreign countries; there are implications of its design scheme in relation to WTO rules on carbon emissions. In addition, the risk of retaliation by other countries and trade wars remains.
 - ICC favours addressing carbon leakage first and foremost by establishing an effective carbon price and global markets.
 - As reported in the ICC's WTO papers, governments should deal with carbon leakage in a multilateral way. In fact, the creation of multiple schemes in different countries will bring high administrative burdens, and lead to regulatory fragmentation and political tensions. Therefore, ICC recommended WTO members to discuss the trade related aspects of CBAM and consider methods to develop a multilateral approach that meets climate goals without violating trade rules, including perhaps via an OECD 'inclusive framework' process. This is also what has been echoed by the WTO's DG.
 - ICC is considering delivering a more general piece on principles for the design of carbon border adjustments and – most interestingly – principles for how a multilateral scheme might be developed. The main goal will be to come up with a mechanism which is minimally trade restrictive, prevents carbon leakage, is based on transparent carbon accounting, is non-discriminatory, supports sustainable development and promotes cooperative climate action.

FOR ACTION: ICC will put together a discussion paper which will be circulated for feedback and contributions among the relevant Commission members (tax, trade and environment) and NCs more generally.

- Update from Charly Gordon, Deputy Director, Innovation for All, on the ICC Working Group on Continuous Transaction Controls (CTCs).
 - The group is a cross-Commission WG (Digital Economy & Taxation Commissions) and is unique in that it is comprised of private and public sector members. The group members work collectively to create a greater understanding and alignment between national and regional CTC models to ultimately facilitate business operations.
 - CTC refers to the growing use of digital technologies by the public sector to collect data on business activities in real time, which ultimately helps to improve the efficiency and quality of public services - this is particularly true for tax administrations.
 - One of the objectives of the group is to build a compelling set of policy recommendations, which, in turn, can help to realise the benefits of CTCs. For instance, for tax administration, CTC helps reduce the tax gap, produce economic statistics, and increase transparency for the private sector. The risk to business is the fragmentation of the new CTC regimes.
 - Another objective of the ICC joint WG on CTCs is to promote consistency and compatibility of CTC processes across borders to reduce the administrative burden for businesses and ensure tax administrations can perform their missions.
 - In 2020, the Working Group published the report “[ICC Continuous Transaction Control \(CTCs\) Practice Principles](#)” as well as a stocktaking report on the Implementation of CTCs.
 - Building on this work, the Working Group is currently focusing on links between i) CTCs SAF-T and e-accounting - to channel views from the business community on the evolution of SAF-T; and ii) examining CTCs B2C transactions - to analyse the various models that are in place. The group is in the process of collectively building the CTC landscape for B2C transactions.
 - Next steps
The goal will be to conduct a comparative exercise and develop concrete recommendations that could take the form of an annex to the practice principles document and focus on the implementation of the CTCs.

10. Future engagement opportunities

The Commission Chair shared areas of ongoing and potential future engagement opportunities.

IP Taxation in Germany:

- The German Federal Ministry of Finance has recently issued its decree on the non-resident taxation of royalty income. By applying a broad approach, German tax liability may also apply to transactions with parties exclusively based in foreign jurisdictions (extraterritorial arrangements). The exploitation of IP in Germany or an entry in a German register are sufficient links to establish a German tax liability.
- The scope of application does not only comprise ongoing licensing arrangements but also the sale or transfer of IP in the past (e.g., as part of a post-acquisition integration exercise or a legal entity rationalisation project). Depending on the type of transaction, the compliance requirements may consist of the deduction of withholding taxes or the filing of non-resident corporate income tax returns.
- According to a recent decree by the German Federal Ministry of Finance dated 11 February 2021, for past payments or such that will occur up to 30 September 2021, WHT would not need to be withheld, if certain requirements – in particular that the creditor has to apply for an exemption certificate with the German Federal Finance Office (BZSt) until 31 December 2021 – are met (deadline extended until 30 June 2022 by decree dated 14 July 2021).

- The developments present significant administrative burden for businesses. Members were asked whether an ICC intervention would be warranted. Failing express interest from members to intervene, developments will be monitored for further discussion.

Pillar Two Implementation

- Mr Kaeser suggested scheduling sessions to share practices, experiences, interpretation related to Pillar Two Implementation which was well received by Members. An email to that extent will be sent to members to express interest in participating in these sessions.

UN Tax Committee

- ICC will liaise with the UN Tax Committee to determine potential work areas for ICC engagement and representation.

11. Date and location of next meeting

Dates of the next meeting will be communicated in due course. It is likely that it is possible to hold a hybrid meeting in Paris, or alongside the next meeting of the UN Meeting of the Committee of Experts on International Cooperation in Tax Matters (25 – 28 April 2022).