

ANNUAL REPORT

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Philippe Arraou, President of ETAF

FOREWORD

Dear ETAF members,

Dear friends,

2022 turned out to be a turbulent year. As soon as the pandemic came to its end, allowing economic recovery and giving rise for new hope, the European Union and the whole world faced a new and incomprehensible challenge: the war of aggression against Ukraine, violating international law and threatening the eastern borders of the Union. The sanctions are important and have their impact, but the truth is that they don't leave our economies within the EU completely unaffected. Times remain challenging.

Looking at our profession more concretely, the project of the European Commission to regulate the role of "enablers" who facilitate tax evasion and aggressive tax planning (SAFE) was for sure one of the most important projects in 2022. ETAF recognised long ago that dubious and abusive tax avoidance schemes jeopardise the States' revenues and that they are unfair to the vast majority of European taxpayers who fully comply with the tax laws. However, given that these structures are operating outside the EU, ETAF advocated that the material scope of such an initiative must stay limited to complex structures in non-EU countries in order to tackle the core of the problem.

Furthermore, after a careful analysis, it became clear that such an initiative would only make sense for non-regulated tax professionals. Tax professionals under a strong professional law cannot be "enablers" of aggressive tax planning – they are rather preventers of aggressive tax planning. ETAF therefore demanded that regulated tax professionals shall be excluded from the scope of SAFE and will stay vigilant in this regard.

Another project of high impact on the profession is the package "VAT in the digital age" adopted by the Commission in December 2022. Electronic invoicing, associated with necessary regulatory changes, will undoubtedly modify our profession profoundly. I am convinced that this major step of digitalization is a huge opportunity for us to focus more on the core business of our work: giving advice. All professionals have to get ready for it!

Besides these, many other topics kept us busy like the Anti-Money Laundering package and its long legislative process, the fight against letter-box companies with the UNSHELL proposal, the new "BEFIT" approach for a common EU corporate tax base or the never-ending Pillar Two saga where an agreement has finally been reached in December 2022.

ETAF is – and will be – the European advocate of regulated tax advisers towards the European institutions. We speak up for appropriate and balanced tax rules, support the modernisation of the international tax system and defend strong, independent and regulated tax professions in Europe.

I am very much looking forward to cooperating with you in this fascinating and dynamic environment in the upcoming year 2023!

Yours faithfully,

Philippe Arraou

SAFE: regulated tax advisers should not be the target



Benjamin Angel, Director for direct taxation, tax coordination, economic analysis and evaluation at the European Commission, during the ETAF conference on 14 June 2022

From the very first mention of the Commission's plan to regulate tax advice, ETAF engaged in the debate around a proposal to tackle the role of "enablers" that facilitate tax evasion and aggressive tax planning (now known as "Securing the Activity Framework for Enablers" or SAFE). Since then, ETAF has made this file one of its top priorities.

ETAF met with Benjamin Angel, Director for direct taxation, tax coordination, economic analysis and evaluation at the European Commission, as soon as January 2022 to discuss the Commission's intentions. A few months later, when the proposal was publicly confirmed during a hearing organized by the subcommittee on tax matters (FISC) of the European Parliament in April, we positioned ourselves in a [press release](#) and reiterated our firm belief that a strict regulation of tax professionals in the EU can make a significant and valuable contribution to the stability of our tax systems. The topic was that important for the profession that we chose it for our June conference.

In July 2022, when the Commission launched its public consultation, we worked hard with our members to define a representative and productive [answer](#). First and foremost, we firmly rejected the Commission's reductive portrayal of an entire profession as "enablers" and urged it to correct this generalisation that would create a great and undue reputational damage to all law-abiding tax professionals. On this occasion, we recalled that as regulated tax professionals play an indispensable role in the tax collecting process of their countries, they are in fact the opposite of "enablers".

Because their professional laws already require them to provide tax advice in line with tax compliance, we advocated that regulated tax professionals should be excluded from the scope of the future Directive. To tackle the core of the problem and avoid disproportionate bureaucracy, we argued that it would be more effective to target non-regulated tax professionals, operating outside any binding professional law framework, and to strictly limit the material scope to complex structures in non-EU countries.

Furthermore, our members asked for a clear definition of aggressive tax planning and appealed to the Commission to strictly separate tax evasion, which is a criminal offence punishable by law in all Member States, from aggressive tax planning, which is legally legitimate, although ethically doubtful.

Concerning the different options proposed by the Commission, we were critical of any measure that would deter legitimate tax planning practices, put tax advisers under a general suspicion, create legal uncertainty or affect existing professional regulations.

In an accompanying [position paper](#), ETAF developed further its view on how ensuring a minimum level of professional regulation by making tax advice a reserved activity everywhere in the EU would be a much more effective tool to achieve the Commission's goal to effectively curb down tax evasion and aggressive tax planning. Our position was broadly relayed in the press by [TaxNotes](#), [Law360](#) and [Agence Europe](#).

ETAF is looking forward to the presentation of the proposal in June 2023 and will keep engaging with EU institutions on this important topic for the profession.

Defending the regulated profession

In July 2022, the European Parliament published a [study](#) on the “Regulation of intermediaries, including tax advisers, in the EU/Member States and best practices from inside and outside the EU”, requested by its subcommittee on tax matters (FISC). The study involved five EU countries and one non-EU country and examined the respective regulatory landscapes of tax intermediaries and their role in improving tax compliance and reducing tax avoidance.

On 15 September 2022, ETAF released a [statement](#) revealing some shortcomings of the study concerning quality and representativity. By covering only Ireland, Germany, Italy, the Netherlands and the United Kingdom, ETAF found that the study has a too limited and potentially misleading scope to actually picture the regulatory landscape of tax intermediaries within the EU. Furthermore, ETAF criticised that despite the study’s finding of “*strong regulations in all five countries*”, actually only Germany has a genuine law-based regulation, while the United Kingdom, Ireland and the Netherlands have a liberal regulatory approach with only voluntary professional codes of conduct.

Nevertheless, we appreciated that the study recognises the positive and important role of tax advisers for the economy and the society and underlines the need to identify and sanction the small group of those who enable undesired tax avoidance without burdening the law-abiding tax intermediaries. Finally, as being the only organisation representing regulated tax professions at EU level, ETAF welcomed the relaunching of academic reflexion on the regulation of tax intermediaries and recalled the importance of such research, especially at a time when tax intermediaries are repeatedly in the political spotlight.

In October 2022, the Committee on Economic and Monetary Affairs (ECON) of the European Parliament published a draft [own initiative report](#) on “lessons learnt from the Pandora Papers and other revelations” (2022/2080(INI)). The draft report addresses the role of intermediaries in facilitating tax evasion and avoidance, harmful competition in income and wealth taxation and the use of shell entities for abusive purposes. As this initiative report brings tax advisers again into the spotlight, on 16 November 2022, ETAF sent a [letter](#) from its President to the MEPs

reacting critically and also providing the MEPs with own amendment proposals to the draft report.

Among other things, we proposed to include a statement that “*it might seem counter-intuitive to continue to increase the legislative burden of law-abiding intermediaries without tightening entry to the tax advisory market*”. In ETAF’s opinion, this restriction of market access in the Member States, consisting in establishing minimum standards regarding professional training, licencing and supervision, would be essential for an effective fight against tax evasion and aggressive tax planning in the European Union. In this regard, ETAF also recalled that the role of professional regulation to guarantee a high quality of tax advice is often underestimated.

On 24 November 2022, the Parliament’s committee published 183 amendment proposals to the draft report. With a follow-up letter, ETAF [reacted](#) on 20 January 2023 on the compromise amendments negotiated by political groups.



MEP Markus Ferber, Vice-Chair of the FISC subcommittee of the European Parliament, during the ETAF conference on 14 June 2022

Through the year with the Anti-Money Laundering package

Through four comprehensive legislative proposals, the [Anti-Money Laundering package of July 2021](#) aims to establish a new EU-wide coherent detection and enforcement system to combat money laundering and terrorist financing. Besides a revision of the [Regulation on Transfer of Funds](#), the package contains a [regulation](#) establishing the foreseen European Anti-Money Laundering Authority (AMLA) and brings together the existing Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) rules fragmented among the Member States in a new [regulation](#) and an accompanying [6th AML-Directive](#). ETAF has closely followed the entire legislative process throughout the year.

Already on 31 January 2022, ETAF participated in an expert hearing on the AML-Regulation of the designated ECON and LIBE committees of the European Parliament, which together with the Council is co-legislator of the AML-package. Representing ETAF in the hearing, our head of office, Michael Schick, not only clarified the profession's concerns about the AML-Regulation and its broad due diligence obligations, but also answered specific questions of the MEPs on the protection of professional secrecy.

On 31 March 2022, ETAF submitted own amendment proposals on the three main legislative proposals to the members of the parliamentary committees. In the amendments, we welcomed and supported the fight against money laundering and terrorist financing and acknowledged that AML/CFT-measures require continuous gathering and exchange of information and close cooperation between entities to be effective. Nevertheless, ETAF expressed concerns that those measures must be carried out in compliance with national structures and competences of the Member States as well as within the limits of professional secrecy. Therefore, ETAF demanded concrete amendments to the new AML-Regulation as well as the 6th AML-Directive so that necessary exceptions to the obligation to report suspicious activities and discrepancies are established and preserved. We also suggested a review of the proposed extended due diligence duties regarding the added value in client identification and verification, in order to not further increase the bureaucratic burden for the profession.

A major concern of ETAF was the far-reaching supervisory power foreseen in the AMLA-Regulation which risks being disproportionate to the various obliged entities in the non-financial sector. Consequently, ETAF advocated limiting AMLA's powers to its intended coordinating, supporting and advisory role.

In its final throes, the French Presidency of the Council succeeded in reaching a [partial agreement](#) on the AMLA-Regulation on 29 June 2022. The Member States agreed on a compromise text that covers the entire framework for the establishment of AMLA, leaving out only the section about its seat. The Council's negotiating mandates on the [AML-Regulation](#) and the [6th AML-Directive](#) followed on 7 December 2022.

The European Parliament has so far not been able to agree on negotiating mandates of all of the three legislative proposals. Draft reports on each of the files have already been presented in March ([AML-Regulation](#)) and May ([AMLA-Regulation](#) and [AML-Directive](#)) 2022. Nevertheless, various MEPs unanimously reported that the flood of proposed amendments to the individual dossiers would only move the process forward slowly.

It is expected that trilogue negotiations on the AMLA-Regulation, the AML-Regulation and the 6th AML-Directive won't start until end of March or beginning of April 2023.



Michael Schick, ETAF head of office, during the EP expert hearing on 31 January 2022

Agreement on minimum taxation: a collective victory



Benjamin Angel, Director for direct taxation, tax coordination, economic analysis and evaluation at the European Commission, and Philippe Arraou, ETAF president, during our conference on 14 June 2022

The year 2022 ended on a very positive note with a much-awaited agreement on the minimum 15% effective tax rate for large multinational enterprises (so-called Pillar Two). From the first proposals of the European Commission in 2018 to the OECD agreement and its implementation in the EU, the road has been a bumpy one. ETAF has always been a front [supporter](#) of this initiative.

The [agreed rules](#) will apply to any large group, both domestic and international, which meets the annual threshold of more than 750 million € of consolidated revenues in at least two of the four preceding years, and with either a parent company or a subsidiary situated in an EU Member State. The final text delays the application of the new rules from 1 January 2023 to 31 December 2023, with the Undertaxed Profit Rule (UTPR) coming into effect in 2024.

Although only very few ETAF members will have to apply the new rules for their clients meeting the threshold, ETAF has closely followed all the developments and debates in the European Parliament and the EU Council on this proposal.

ETAF also took part in the debate, by sending on 18 March 2022 its [feedback](#) to the European Commission on the proposed Directive. In the course of the negotiations between Member States, we pushed for legal certainty, clear regulations and the avoidance of double taxation.

One fundamental point for ETAF was that the EU, as well as the other jurisdictions parties to the deal, should implement the rules as closely as possible to the [OECD model rules](#). In this regard, we paid a particular attention to the way the Directive would take into account the OECD Implementation Framework.

As the success of the global minimum tax reform heavily relies on its worldwide implementation, one of our key proposals was to introduce a sunset clause in the text to ensure that if a significant number of our big international partners don't comply with the deal, the Directive will automatically cease to apply. Our proposals have been covered in the press by [Agence Europe](#) and [TaxNotes](#).

Until the end of the negotiations, we elaborated several internal briefings on this topic to help our members to better understand the proposed rules and the legislative process. We also kept our members regularly updated on any new development at OECD or EU level through the Weekly Tax News.

Taxation is a matter on perpetual evolution and tax advisers should be open and prepared to any future development, including a lowering of the threshold and the event of an application of the new rules to smaller companies.

Fighting the misuse of shell entities in the EU

In line with its mission to promote good legislation in tax matters and contribute to fight tax abuse and illegal acts, ETAF engaged in the discussions around the proposal for a [Directive](#) laying down rules to prevent the misuse of shell entities for tax purposes (UNSHELL), published in December 2021.

The proposal seeks to create a new minimum economic substance test, organized in several steps, to help Member States identify undertakings that do not perform any actual economic activity and that can be misused for tax avoidance or evasion purposes. According to the proposed rules, being declared as a shell company would have consequences for the tax treatment of the transactions and assets of the entity.

On 6 April 2022, ETAF sent a [feedback](#) to the European Commission and formulated comments about the scope, the complexity, the burden of proof, proportionality and the consequences. Our position had a great echo in the EU press and was covered by [Agence Europe](#), [TaxNotes](#) and [Bloomberg Tax](#).

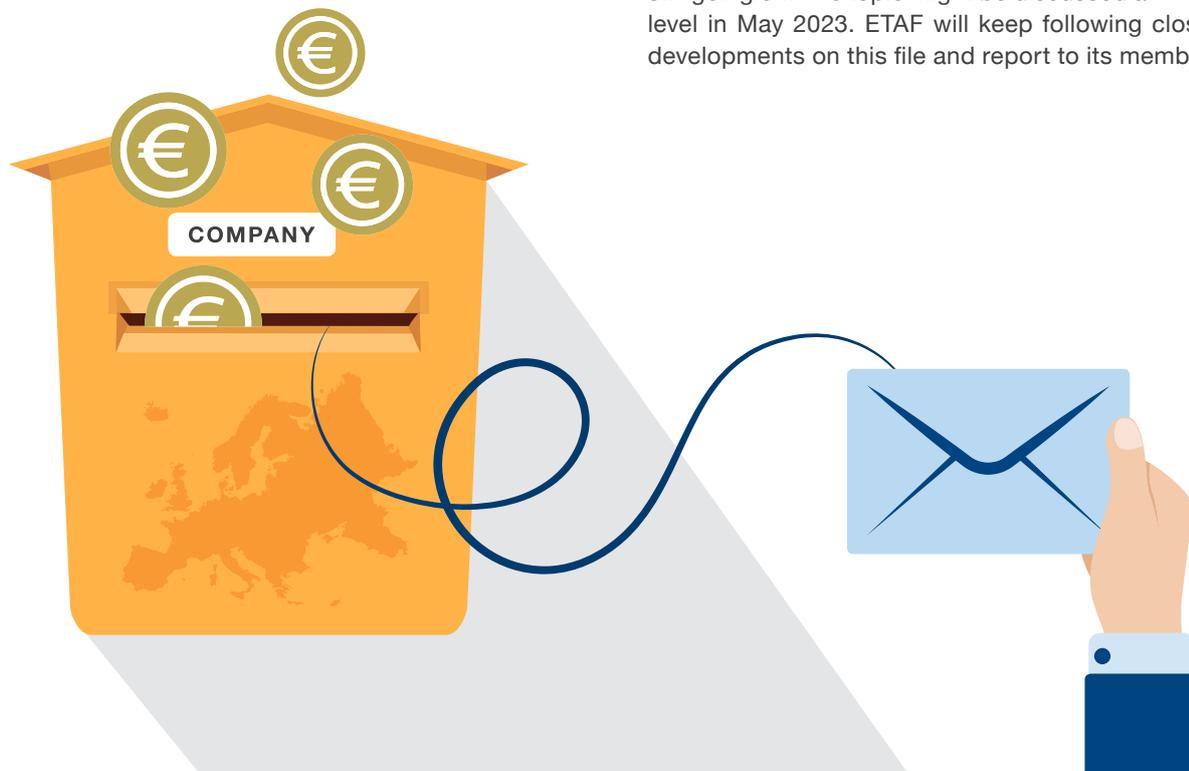
It has also made its way through the European Parliament as ETAF was invited by the rapporteur in the European Parliament, MEP Lídia Pereira (EPP, Portugal), to an online *in camera* experts meeting on this proposal on 12 July 2022 to prepare the EP non-binding opinion on the Directive.

During the meeting, ETAF's head of office, Michael Schick, recalled that the scope chosen is very broad and highlighted our concerns about the administrative burden that this could generate for taxpayers and tax advisers. In particular, he encouraged legislators to rethink if the exact same requirements should apply to SMEs and to large companies. He also supported the rebuttal mechanism and the exemption for lack of tax motives but warned MEPs about the considerable workload to invoke them and the need for clear guidance.

In ETAF's opinion, the two-tier system proposed in the Directive indeed creates a lot of complexity. For this reason, a single set of indicators and a uniform concept of minimum economic substance would have been preferable. Some of the criteria proposed are too far-reaching and, as a consequence, a significant number of companies is expected to cross the gateway and thus to fall under the reporting requirements.

One of our proposals to ease the burden created by this Directive is that the presumption of economic substance stays valid until there is a substantial change which may affect the ability of the undertaking to meet the economic minimum substance indicators, instead of having to be proven every year.

The European Parliament adopted its non-binding [opinion](#) in January 2023 while discussions in the EU Council are still going on. The topic might be discussed at ministerial level in May 2023. ETAF will keep following closely the developments on this file and report to its members.



Navigating through VAT in the digital age



Patrice Pillet, Head of VAT unit at the European Commission, during ETAF conference on 7 December 2022

The European Commission published its [new VAT package](#) on 8 December 2022 with the intention to adapt the 30-year-old VAT system to the digital age and to use technology to reduce the administrative burden and associated costs for businesses. At the same time, it wants to reduce the vulnerability of the VAT system to fraud and close the so-called "VAT gap".

The package consists of the following three initiatives:

- Digital Reporting Requirements (DRR),
- Updated VAT rules for passenger transport and short-term accommodation platforms,
- The introduction of a single VAT registration in the EU.

In their [answer](#) to the European Commission's public consultation on 4 May 2022, ETAF members outlined that a fragmented approach on digital reporting/e-invoicing requirements contributes to tax fraud and increases the compliance costs for SMEs. For this reason, ETAF welcomed the intention of the European Commission to introduce EU digital reporting requirements for data transmission within the EU.

Nevertheless, ETAF pointed out the necessity to consider the fact that Member States have different levels of implementation or planning for the introduction of digital reporting obligations and e-invoicing. For this reason and also considering the differences in tax administrations and tax law procedures, Member States should keep some discretion over the design and functioning of their e-invoicing system.

ETAF also advocated for changes in the VAT Directive and Implementing Regulation to ensure the proper VAT treatment of the platform economy. Here, it is of utmost importance that a level-playing field between traditional and platform economy is ensured by treating them in the same way.

ETAF members are currently working on a more detailed feedback to the Commission on the whole package.



ETAF voices concerns over DEBRA

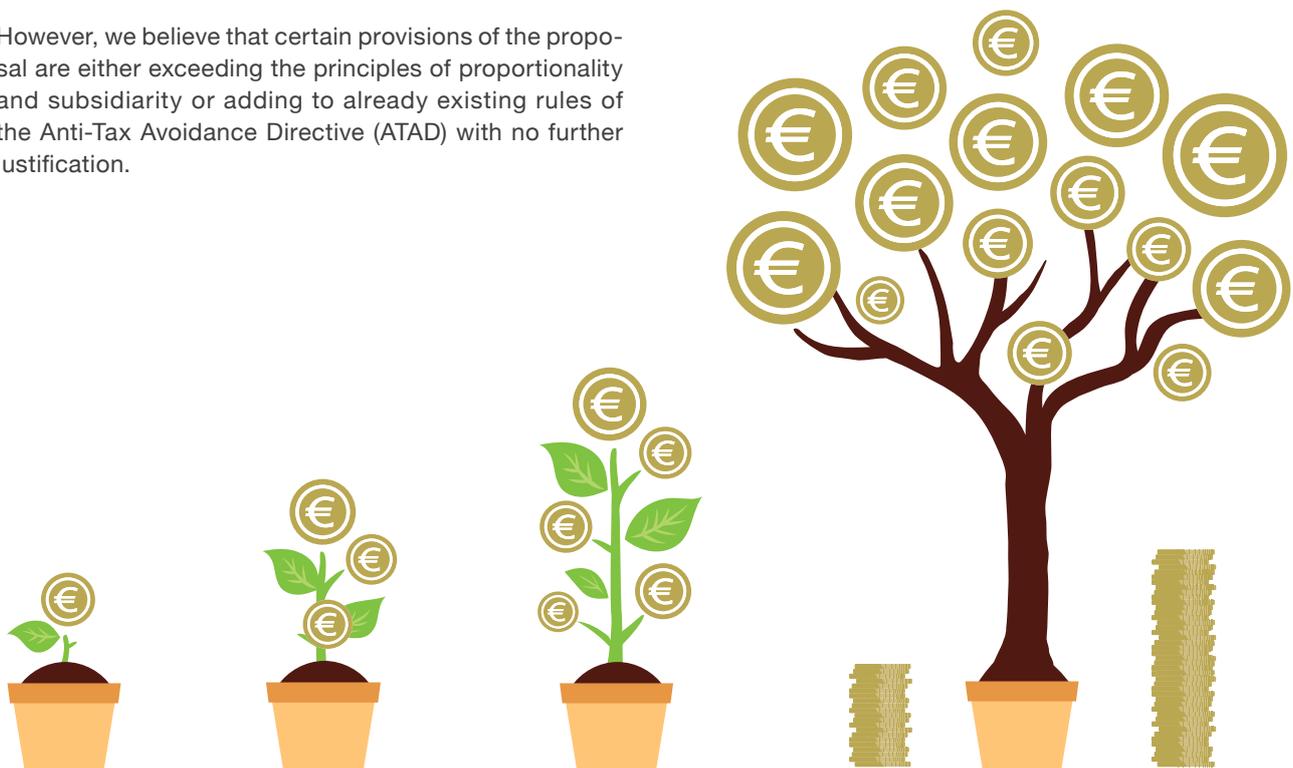
In May 2022, the European Commission published its [proposal](#) for a debt-equity bias reduction allowance (DEBRA), combining an allowance for new equity and a limitation to the deductibility of debt costs. The objective is to ensure that equity receives similar tax treatment as debt, so that companies can consider both options equally and choose the source of financing that is best for their business-model. Stakeholders had time to hand in feedback until end of July. ETAF took the opportunity to voice some [concerns](#) about the proposal.

In principle, ETAF recognizes that high levels of debt make companies in the EU more vulnerable to insolvency and that they should be encouraged to use less debt financing and more equity financing. From an economic point of view, neutrality in financing should be favoured. Specifically, for long-term investments with a high degree of risk it can be difficult to find lenders. We believe that improving the conditions for equity financing can help promote much needed investments in the fields of digitalisation, sustainability and climate protection.

However, we believe that certain provisions of the proposal are either exceeding the principles of proportionality and subsidiarity or adding to already existing rules of the Anti-Tax Avoidance Directive (ATAD) with no further justification.

Article 6 of the proposal for example, which regulates the limitation of interest deduction, does not provide possibilities of exceptions for non-group companies or for a de minimis limit (3 million €) below which a full deduction of interest expenses remains possible, like it is provided for in the ATAD. This might especially become problematic for SMEs, who often do not have the choice between equity and debt financing.

In December 2022, Member States decided to put on hold the discussions on the proposal in light of the many interlinkages with other corporate tax files, both those currently under discussion in the Council and those announced by the Commission in the near future, in particular the future framework for income taxation (BEFIT) to be issued in 2023. The proposal will be reassessed in a broader context when BEFIT will have been put forward.



Towards a European withholding tax framework

The European Commission is working on a proposal to introduce a common EU-wide system for withholding tax on dividend or interest payments. The problems the Commission aims to tackle are the particularly burdensome withholding tax refund procedures for cross-border investors in the EU and, at the same time, the risks they present in terms of tax abuse, as recently demonstrated by the 'Cum-Ex' scandal. ETAF already sent a [feedback](#) to the European Commission on its roadmap for this initiative in October 2021.

In a public consultation launched in April 2022, the Commission presented several options for how to take this initiative forward:

- maintain the current system with different national procedures in place;
- create a harmonized system of relief at source;
- create a harmonized system of improved refund procedures;
- or a combination of the above systems (relief at source and refund system).



For ETAF members, there is no doubt of a need for EU action in order to make withholding tax refund/relief procedures more efficient. In their [answer](#) to the public consultation on 23 June 2022, they acknowledge that withholding taxes as such can reduce the risk of tax evasion and avoidance.

However, currently, refund procedures are often complex, lengthy and costly and can discourage investors even more from making investments in certain countries or having to accept double taxation, which cannot be the intention of the Single Market.

For this reason, ETAF is in favour of harmonised systems of tax relief at source. ETAF also believes that a potential EU relief at source system should apply to all payments, not only to those with a low risk. Should this be restricted to prevent possible abuses, ETAF members suggested that payments up to at least 10.000 € could be classified as low-risk payments.

ETAF closely followed several studies and initiatives on this subject, including the European Parliament's [recommendations](#) adopted in March 2022, and looks forward to engaging further in the discussions when the Commission will present its proposal, in June 2023.



ETAF General Assembly 2022



ETAF General Assembly on 14 June 2022

On 14 June 2022, ETAF held its annual General Meeting, in the Stanhope Hotel in Brussels. On this occasion, ETAF President Philippe Arraou reported about the activities of ETAF and pointed out that even with the COVID-19 pandemic still going on, ETAF managed to stay active and vigilant and maintained good relations with the European institutions.

Among other things, ETAF members discussed their tax and professional law priorities for the upcoming year, a new public relations strategy as well as the recast of the ETAF website and a new design for our newsletters.

ETAF Conference “Professional regulation: a cornerstone for curbing down abusive tax avoidance”



Philippe Arraou (ETAF President), Todd Buell (Tax journalist at Law360), Sarah Godar (Researcher at the EU Tax Observatory), Benjamin Angel (Director for direct taxation, tax coordination, economic analysis and evaluation at the European Commission), Philippe Vanclooster (Former partner at PwC and Board member of ITAA), Markus Ferber (MEP and Vice-Chair of the FISC subcommittee of the European Parliament)

On 14 June 2022, ETAF gathered in Brussels EU officials and tax advisers from all over Europe to discuss how the regulation of the tax adviser profession can help curb down abusive tax avoidance. The ETAF [conference](#) was a good opportunity for speakers to discuss the upcoming proposal for a Directive to tackle the role of enablers that facilitate tax evasion and aggressive tax planning (Securing the Activity Framework for Enablers – SAFE).

On this occasion, the Director for direct taxation, tax coordination, economic analysis and evaluation at the European Commission, Benjamin Angel, reiterated that the Commission does not intend to regulate the tax profession as such but that it will put forward a set of rules that fit for all the people providing tax advice for creating structures in third countries. ETAF President, Philippe Arraou, argued that tax advice should be recognized as a reserved activity everywhere in the EU and that every Member State should introduce a national binding professional law framework. *“When designing this new law for tax advisers, legal certainty will be key. It is highly important not to pass on the responsibility for loopholes in the legislation to those who are subject to the law”*, he also warned.

For MEP Markus Ferber, Vice-Chair of the subcommittee on tax matters (FISC) of the European Parliament, the European Union should first try to put its house in order before looking outside of its borders. Sarah Godar, Researcher at the EU Tax Observatory, agreed that the lawmakers should make sure that there are as little

loopholes as possible but also hoped that tax advisers contribute to making the laws better.

Representing the tax profession in the debate, Philippe Vanclooster, former partner at PwC and Board member of the Belgian Institute for Tax Advisors and Accountants (ITAA), outlined how the role of tax advisers in Europe has evolved.

The debate was led by Todd Buell, Tax journalist at Law360. Over 50 people attended the conference in person at the Stanhope Hotel while almost 150 participants joined online. It was covered in the press by [TaxNotes](#) and [Law360](#).



ETAF Conference “VAT goes digital - the tax practitioners' perspective”



For its second conference of the year, organized on 7 December 2022, ETAF chose as a topic: “VAT goes digital – the tax practitioners’ perspective”. On this occasion, tax advisers discussed with Patrice Pillet, Head of Unit VAT at the European Commission, how the package “[VAT in the digital age](#)” (ViDA) will affect our profession and what are its expected benefits, just one day before its official adoption.

ETAF very much welcomed and supported the staged approach on e-invoicing and digital reporting proposed in the new package. The proposed quasi real time access to invoicing information through an EU central database would save EU businesses over 4.1 billion euros per year on average in compliance costs over the next ten years, Patrice Pillet estimated.

Dr. Stefanie Becker, the ETAF representative in the Commission’s VAT expert group and Olivier Hody, Tax Adviser from ITAA and Partner at the Deloitte Global Tax Center Europe, represented the profession during the debate. The existing fragmentation of e-invoicing systems makes it really difficult for businesses to work cross-border and it is urgent to have a solution at EU level, Dr. Stefanie Becker explained. Olivier Hody highlighted the concerns of the profession with the entrance of new e-invoicing players on the market and the potential “*uberisation risk*”.

Speakers also discussed the two other pillars of the package: the updated VAT rules for passenger transport and short-term accommodation platforms as well as the introduction of a single VAT registration across the EU.



Elodie Lamer (Tax journalist for TaxNotes), Patrice Pillet (Head of Unit VAT at the European Commission), Dr. Stefanie Becker (ETAF representative in the Commission’s VAT expert group), Olivier Hody (ITAA Tax Adviser and Partner at the Deloitte Global Tax Center Europe)

ETAF reappointed as member of the Commission's VAT Expert Group



Dr. Stefanie Becker, ETAF's main representative in the VAT expert group of the European Commission, and Patrice Pillet, Head of VAT unit at the European Commission, during our conference on 7 December 2022

On 12 September 2022, ETAF was [reappointed](#) as member of the [VAT Expert Group](#) of the European Commission. For a period of three years, Dr. Stefanie Becker, as our main representative, and Benoît Vanderstichelen, as her alternate, will advise the Commission on behalf of ETAF on the preparation of legislative acts and other political initiatives concerning VAT. The purpose of the expert group is to provide practical insights and good practice examples to the Commission and to assist in the development and implementation of VAT policies of the European Union. ETAF, who already served as a member from 2019-2022, is delighted to have the possibility to continue working within the expert group.

As a self-employed tax adviser in Germany, Dr. Stefanie Becker is member of the German Federal Chamber of Tax Advisers (Bundessteuerberaterkammer, BStBK) and since 2016, member of its special VAT working committee. She lectures on VAT law at the University of Augsburg, at the KNOLL Tax Law Institute in Munich (education of tax advisers) and also for several private educational institutions.

ETAF's second delegate, Benoît Vanderstichelen, is member of the Belgian Institute for Tax Advisors and Accountants (ITAA) with more than thirty years of experience in national and international VAT consulting. Since 1993, he is a scientific assistant at the Law Faculty of the Université Libre de Bruxelles (ULB), teacher at the I.C.H.EC. (Enseignement Supérieur des Sciences Fiscales) and at the Solvay Brussels School – Economics and Management, and a regular lecturer at seminars.

With their extensive knowledge and practical experience, both delegates will be able to make a meaningful contribution to the group and bring their valuable perspective as practitioners.



Benoît Vanderstichelen, ETAF's alternate representative in the VAT expert group of the European Commission

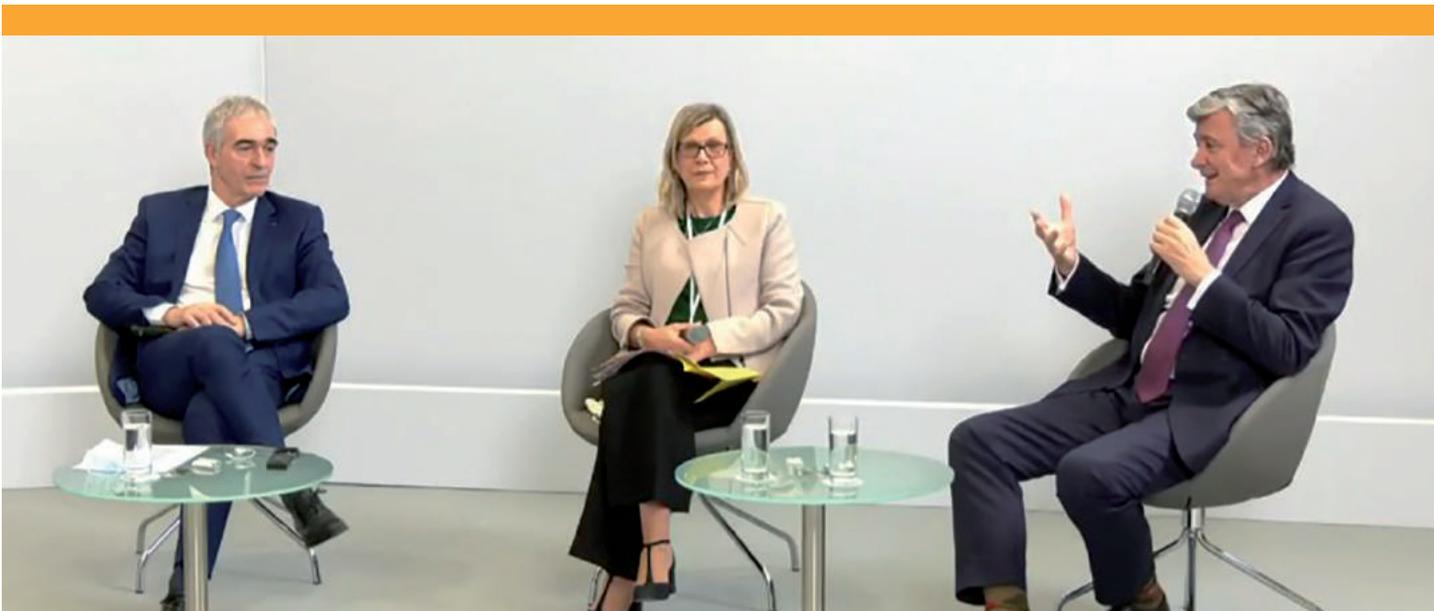
Philippe Arraou participates to the French Presidency's conference on e-invoicing

On 10 February 2022, ETAF President, Philippe Arraou, participated to a ministerial [conference](#) on electronic invoicing, organized by the French Presidency of the EU Council in Paris. Participants discussed the upcoming French reform of e-invoicing, which will start applying to large companies on 1 July 2024 and expand progressively to all companies in 2026 as well as the existing systems in Italy, Spain and Portugal.

Olivier Dussopt, French Minister Delegate, reporting to the Minister for the Economy, Finance and the Recovery, with responsibility for Public Accounts, recognized the many advantages of an EU initiative on e-invoicing such as reducing the VAT gap and fighting the carousel fraud but outlined that the difficulty is to combine the harmonisation of rules, the compatibility of systems and ensuring that each Member State must be able to keep its own

timetable and be free for a number of choices in terms of implementation. In particular, each Member State must be able to decide unrestricted on putting in place its own accompanying solutions for businesses, he stressed. For his part, ETAF President, Philippe Arraou, regretted the lack of political will from Member States to advance together at EU level on e-invoicing.

Some speakers also outlined the challenges of e-invoicing and e-reporting, especially for SMEs. Their concerns related to direct and indirect costs as well as to the complexity of the new systems.

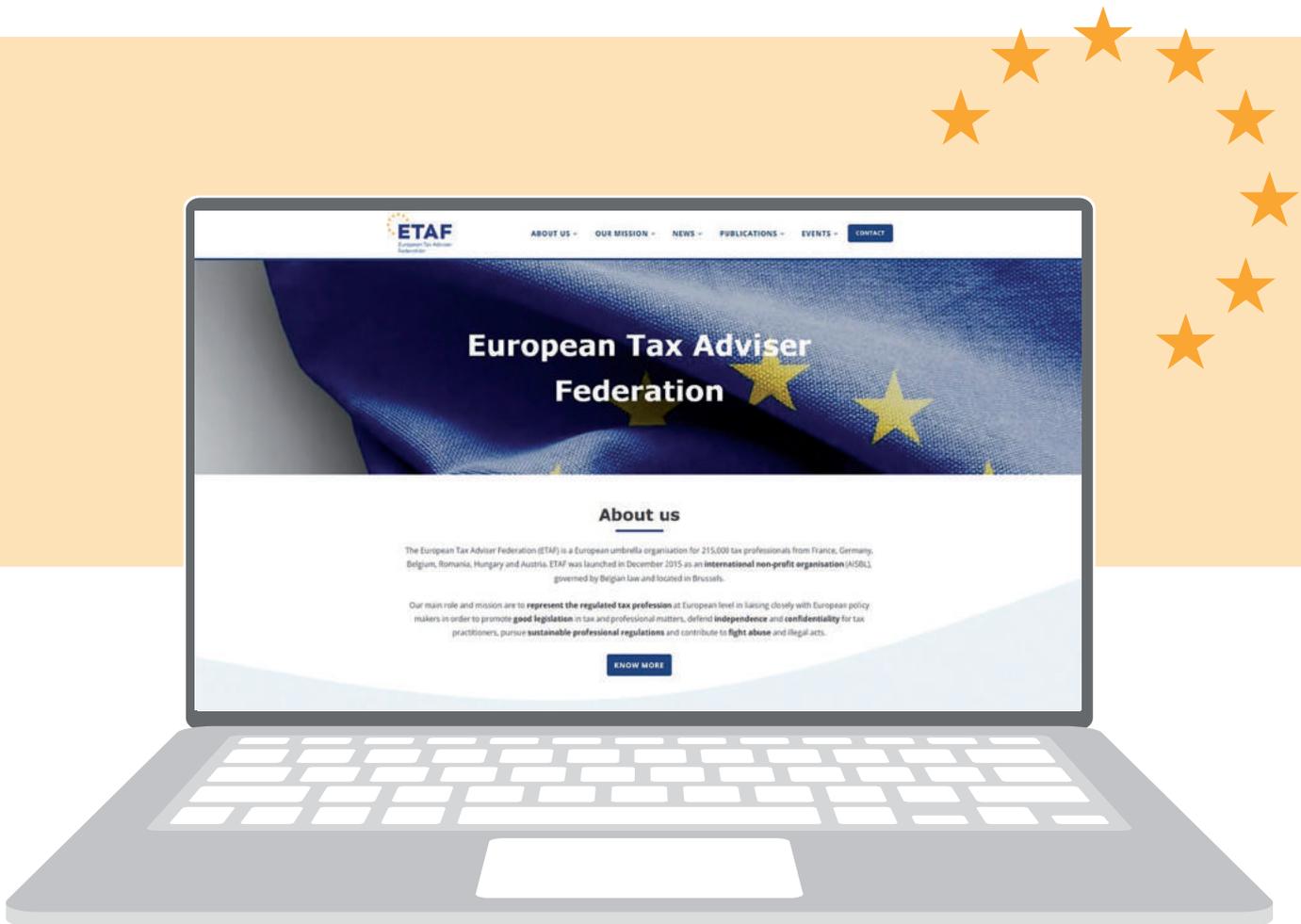


Jean Saphores (Vice-President in charge of the Trade Digital Future in the Conseil supérieur de l'ordre des experts comptables), Armelle Degeneve (Director of the State Agency for Financial Information Technology – AIFE), Philippe Arraou (ETAF President), during the French Presidency's conference on 10 February 2022

A brand-new ETAF website

In 2022, ETAF made a makeover to its website. The address remains the same but the design and the navigation has been reshaped and information has been made

more accessible. The new website has been launched on 1 December 2022, alongside with new design for all our newsletters. We hope you enjoy it!



ETAF ACTIVITIES 2022

7 January	Meeting with Benjamin Angel, Director for direct taxation, tax coordination, economic analysis and evaluation, DG TAXUD, European Commission
31 January	Participation to an ECON-LIBE committees hearing on the AML regulation
10 February	Participation to a conference on e-invoicing organized by the French Presidency of the Council of the EU
3 March	Meeting with Rachael Wheeler, Fiscal attaché at the UK Mission to the European Union
25 April	Coordination meeting with ITAA on AML
10 May	Meeting with Johan Barros, Senior manager, Accountancy Europe
14 June	ETAF General Assembly
14 June	ETAF Conference “Professional regulation: a cornerstone for curbing down abusive tax avoidance”
14 July	Participation to a FISC subcommittee hearing on UNSHELL
28 September	Meeting with Cecile Bonino, Head of EU Affairs, ACCA
28 September	Meeting with Johan Barros, Senior manager, Accountancy Europe
26 October	Meeting with a DATEV delegation
15 November	Meeting with Patrice Pillet, Head of VAT unit, DG TAXUD, European Commission
7 December	ETAF Conference “VAT goes digital – the tax practitioners’ perspective”



DISCLAIMER:

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ETAF is a European umbrella organisation for 215 000 tax professionals from France, Germany, Belgium, Romania, Hungary and Austria. ETAF was launched in January 2016 as an international non-profit organisation (AISBL), governed by Belgian law and located in Brussels.

The main role and mission of ETAF is to represent the tax profession at European level in liaising closely with European policy makers to promote good legislation in tax and professional matters. ETAF is a registered organisation in the EU Transparency Register with the register identification number 760084520382-92