

## ***Workshop 1 – Taxation: European Harmonisation?***

***Friday 8th September 2006***

***9:00 to 10:30***

### **Facilitator:**

***Stefano Marchese, FEE Vice-President & Direct Tax Working Party  
Chairman***

FEE Annual European SME/SMP Congress, Palais des Congrès, Versailles, France, 7th & 8th September 2006

## ***Workshop 1 – Taxation: European Harmonisation?***

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### **Speakers:**

***Rolf Diemer, Head of Unit VAT & other turnover taxes, DG Taxation and Custom  
Union, European Commission***

***Professor Norbert Herzig, Director of the Department of Business Administration  
and Taxation, University of Cologne, Germany***

***Professor Francis Chittenden, Chairman of Small Business Committee, ACCA, UK***

***Stephen Dale, Chairman FEE Indirect Tax Working Party***

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## **Taxation: European Harmonisation?**

Stefano Marchese

*FEE Vice-President in charge of Taxation  
Chairman FEE Direct Tax Working Party*

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## **Harmonization v. Co-ordination Major Trends**

- Indirect Taxes (VAT and excise): Legislative Harmonization
- Direct Taxes: Legislative and “soft law” Coordination
- European Court of Justice: Negative integration by case law for direct and indirect taxes

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## Main Projects

- CCCTB: Common Consolidated Corporate Tax Base
- HST: Home State Taxation
- VAT One stop shop (single place of compliance)
- VAT Place of supply for B2B and B2C
- VAT law consolidated text

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## Main Problems

- Compliance costs, mainly for SMEs
- Political difficulties in achieving harmonization and coordination projects
- Tax driven business decisions and loss of neutrality

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## FEE Main Current Initiatives

Direct Tax Working Party  
Indirect Tax Working Party  
ECJ Subgroup  
CCCTB Subgroup

- Documents, comparative studies, position papers
- Contributions to the EC Commission
- Link with the main tax organisations

<http://www.fee.be>

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## Speakers

- Rolf Diemer, *Head of Unit VAT and other turnover taxes, DG Taxation and Custom Union, European Commission*
- Prof. Dr. Norbert Herzig, *Germany*
- Prof. Francis Chittenden, *Chairman of Small Business Committee, ACCA, UK*
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Taxation and Customs Union

**FEE/AMA SMEs / SMPs Congress:**  
*Growing Business in a changing global environment*

**Taxation:  
European Harmonisation?**

Point of view from the European Commission


Rolf Diemer  
European Commission

Taxation and Customs Union

## Table of content

- General framework: Harmonisation at EU level in indirect and direct tax areas
- Common Consolidated Corporate Tax Base and Home State Taxation
- VAT issues for SMEs

September 20062




**General framework:**  
**Harmonisation at EU level in indirect and direct tax areas**

Taxation and Customs Union

- Different **legal bases** in EC Treaty:  
Harmonisation for indirect taxation vs.  
Approximation of laws for direct taxation
- Different **degree of EU harmonisation**:  
relatively advanced in VAT (Sixth Directive) vs.  
several directives and 'soft law' (e.g. Code of  
Conduct) in company taxation
- **Economic framework**: Lisbon strategy /  
Burdens on business / Competitiveness
- **Subsidiarity** principle – discussion about its  
interpretation

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**CCCTB and Home State Taxation**

Taxation and Customs Union

- **Background**: Company Tax Communication &  
Study 2001 – effective tax rates; tax obstacles in  
Internal Market; remedies
- **Twin track strategy** to combat company tax  
obstacles in Single Market: various targeted  
measures and, in longer term, common tax base
- All realistic options for **common tax base** would
  - offer companies the possibility of using a single tax base for  
all their EU-wide activities
  - require a mechanism for allocating tax base / tax revenues  
between MS
  - leave MS setting tax rates
  - ✓ two retained: CCCTB and HST

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# CCCTB

Taxation and Customs Union

- 2003 – Confirmed CCCTB in **follow up Communication**
- 2004 – ECOFIN (informal) : support for **CCCTB Working Group**; Nov 2004 – CCCTB Working Group established
- Oct 2005 – Lisbon Communication: political objective - 2008
- Dec 2005 – 1<sup>st</sup> WG with business and academics
- April 2006 – **Communication: 'Progress to date and next steps towards a CCCTB'** [COM(2006)157] – includes **political statements** (simple, transparent, broad base; IAS/IFRS as tool but no formal link; consolidation; optionality for companies)
- June 2006 – Discussion by Finance Ministers (**ECOFIN**)
- Ongoing technical work in working group and sub-groups

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# Home State Taxation

Taxation and Customs Union

- Approach:** Mutual recognition between Member States via bilateral or multilateral agreement between interested Member States with similar tax base
- SME aspects:** addressing the tax issues which hamper SMEs most in their cross-border activities: compliance costs, loss-compensation on start-ups etc. ;
- MS perspective:** Lower amount of tax 'at stake'; problems less important for SMEs (e.g. double-tax treaties, definition of 'home state' etc.)
- Pilot scheme:** Commission Communication setting out possible pilot project in December 2005 in detail (definitions, timeframe, allocation formula, special cases, auditing etc.) – response by MS at best uncertain

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## VAT issues for SMEs



Taxation and Customs Union

- Based on current VAT strategy: simplification, modernisation, uniform application
- Pending proposals under negotiation:
  - Simplification (One stop shop, 8th Directive, etc.)
  - Place of supply - B2B and B2C
  - Recast
- Rates
- Prospects and new initiatives 2006/2007

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## Simplification proposal



Taxation and Customs Union

- one stop shop in the strict sense
- one stop shop for refunds
- limitations to the right to deduct
- extension of the reverse charge
- review of the SME scheme
- review of the distance selling rules

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## One stop shop



Taxation and Customs Union

- **Optional** scheme offering ALL taxable persons who are liable to pay tax in several Member States the possibility of a **single place of compliance** in the Member State where they are established (not limited to sectors or SMEs)
- VAT return to be submitted **electronically** (VAT due by rate; VAT deductible)
- **Payment directly** to MS where VAT is due
- **Control** - maintain control capabilities; coordinated control procedures

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## One stop shop for refunds



Taxation and Customs Union

- Current 8th Directive procedure
  - Paper based
  - Administrative burden for business and administrations
  - Out of date
- Cross-border deduction proposed in 1998
  - preferable reform
  - blocked in Council
  - subsequently withdrawn

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## One stop shop for refunds



Taxation and Customs Union

- Reform now proposed
  - no change of the principles
  - modernisation of procedure: fully electronic
  - speeded-up procedure
  - more legal certainty for business
  - better control possibilities
- Limitations to the right to deduct
  - issue was covered by proposal from 1998
  - no agreement in Council
  - desirable to harmonise the scope of the restrictions

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## Extension of the reverse charge



Taxation and Customs Union

- Obligatory reverse charge when a non established supplier carries out
  - supplies of goods which are installed or assembled by or on behalf of the supplier
  - supplies of services connected with immovable property
  - services covered by Article 9(2)(c)

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## Review of the SME scheme



Taxation and Customs Union

- Threshold of maximum € 100 000
- Purpose
  - put MS on equal footing
  - give flexibility to MS

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## Review of the distance selling rules



Taxation and Customs Union

- **Point of departure:** the rationale for setting up the scheme in 1993 - i.e. the risk of insufficiently harmonised tax rates leading to distortion of competition - still exists.
- **Proposal** = not to abolish the scheme but instead to simplify its application.
- **Global threshold** instead of threshold per Member State of destination

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## Technical aspects



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- Registration
  - Declaration
  - Refund claim
  - Exchange of information
- Details in principle to be decided later

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## Relationship with B2B, B2C



Taxation and Customs Union

- Consistent with B2B proposal
- Provides a practical solution for complying with obligations arising from B2C proposal

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## Place of supply - B2B services



Taxation and Customs Union

### Background

- Changing taxation requirements in response to changing trade patterns
- Ease burden for taxable persons
- Balance of interests

### Proposal will

- Simplify rules for B2B
- Avoid multiple registrations
- Increase use of reverse charge
- Require modernisation of VIES

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## B2B services



Taxation and Customs Union

- A change of the general rule
  - taxation at the place of the customer becomes the general rule
  - (as today) a number of exceptions (notably immovable property; cultural services; renting means of transport; restaurant services; intermediary services)
  - taxation at the place of the supplier remains as an exception for some services
- Consequences: Extension of reverse charge and extension of VIES to services

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## Place of supply - B2C services



Taxation and Customs Union

### Background

- Changing taxation requirements in response to changing trade patterns
- Ensure taxation at place of consumption
- Align with B2B

### Problems with current rules

- Main rule now = taxation where supplier has his business from which the supply is made [Article 9(1)]
- Simple for traders BUT
  - Revenue distortions when remote delivery is possible (e.g. telecoms, e-commerce)
  - Principle of taxation where consumed not observed

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## B2C services



Taxation and Customs Union

- Approach is, where necessary, to tax where customer is resident, but no change to general rule
- To avoid complications for traders, use one stop shop system
- Special rules suggested for :
  - Restaurant and catering services
  - Hiring means of transport
  - Remote supplies
  - Intermediary services
  - Passenger transport services

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## State of play



Taxation and Customs Union

- No (political) agreement at ECOFIN Council of 7 June 2006 on 'VAT package'
- Extension of e-commerce Directive until 31.12.2006 – further prolongation?
- Link to possibility for general (domestic) reverse-charge mechanism sought by DE and AT
- FI Presidency continues technical meetings – compromise being sought ...
- COM insists that OSS goes hand in hand with new place of supply rules

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## Recast



Taxation and Customs Union

- Purpose: consolidate EU VAT rules into updated coherent text
- Simplification and transparency
- Good progress under Luxembourg and Austrian Presidency
- Problems remaining: mainly technical and sometimes linguistic
- Prospect: chances of adoption under FI Presidency

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## Rates – Standard rate



Taxation and Customs Union

- Council Directive 2005/92/EC of 12 December 2005  
=> extent the scope of standard rate until 31/12/2010

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## Rates – Reduced rate



Taxation and Customs Union

- Proposal COM (2003) 397
  - to afford Member States equal opportunity to apply reduced rates in certain fields (e.g. restaurants, housing, domestic care and the supply of gas and electricity)
  - to rationalise the numerous derogations currently applied in some Member States
  - to fix definitively the VAT rate to certain labour-intensive services: the Commission proposed allowing a reduced rate in housing sector and domestic care services, but not the other services currently covered by the experience

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## Rates – Reduced rate



Taxation and Customs Union

- No agreement at European Council of 15/16 December 2005
- Compromise reached by ECOFIN in February 2006
  - prolongation of Annex K until 31/12/2010
  - inclusion of 'district heating' to present procedure for natural gas and electricity
  - study and COM rapport in 2007

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## Prolongation of annex K until 31/12/2010



Taxation and Customs Union

- Commission Proposal for a Council Decision authorising 17 Member States to apply a reduced rate of VAT to certain labour-intensive services (LIS) until 31/12/2010 adopted on 24 July
  - Member States that already applied reduced rates to LIS: BE, FR, IT, LU, NL, PT, ES and UK.
  - Member States wishing to apply for the first time a reduced rate to LIS, for the sectors they have notified to the Commission before 31.3.2006: CY, CZ, FI, HU, MT, LT, PL, SI.
  - EL requested for an extension of the scope of its previous request.
- Full information on scope etc.:  
[http://ec.europa.eu/taxation\\_customs/index\\_en.htm](http://ec.europa.eu/taxation_customs/index_en.htm)

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## Labour-intensive services chosen by MS



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- Repairs to bicycles, shoes and leather goods, clothes and household linen for Belgium, Greece, Luxembourg, Hungary, Malta, the Netherlands, Poland and Finland
- The renovation of private dwellings, excluding materials which form a significant part of the value of the supply, for Belgium (*dwellings completed more than 5 years ago*), the Czech Republic, Greece, Spain (*only bricklaying work*), France (*dwellings completed at least 2 years ago*), Italy, Cyprus, Latvia, Hungary, the Netherlands (*painting and plaster work on dwellings more than 15 years old*), Poland, Portugal, Slovenia and the United Kingdom (*Isle of Man only*)
- Window cleaning and cleaning in private dwellings for the Czech Republic, France, and Luxembourg
- Domestic care services for the Czech Republic, Greece, France, Italy, Hungary, Malta and Portugal
- Hairdressing for Spain, Cyprus, Latvia, Luxembourg, the Netherlands, Poland and Finland

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## Inclusion of 'district heating'




Taxation and Customs Union

- Add **district heating** to natural gas and electricity in the option of Article 12(3)(b) of the 6th VAT Directive
- **Purpose:** to achieve an equal VAT treatment of supplies of natural gas, electricity and district heating.
- **Procedure:** MS wishing to apply a reduced rate to these supplies have to introduce a formal request to the Commission. The Commission shall then give a decision on the existence of a risk of distortion of competition.

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## Study and COM report 2007

Taxation and Customs Union

- **Commission** obligation to present a **report** to the Council and the EP by the end of June 2007, providing for an overall assessment of the impact of reduced rates applying to locally supplied services, including restaurant services, notably in terms of job creation, economic growth and the proper functioning of the internal market, based on a **study carried out by an independent economic think-tank**.
- Study was awarded, following an accelerated tender procedure (contract award notice published in OJ).
- Potential **contributions** are to be sent to Commission services: [TAXUD-D1-RATES@ec.europa.eu](mailto:TAXUD-D1-RATES@ec.europa.eu)
- Member State **evaluation** of experimental application of reduced VAT rates so far will be important.

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## Prospects and planning 2006/2007

Taxation and Customs Union

- Vouchers and promotion schemes
- Financial services
- Public authorities & subsidies
- Mechanism to avoid double taxation
- Communication on VAT Strategy

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- Follow up to Communication on tax fraud
- Continuing discussion about 'reverse-charge'

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# Home State Taxation and Common Consolidated Corporate Tax Base

Prof. Dr. Norbert Herzig,  
Cologne/Germany

## **Background**

- Harmonisation of indirect taxes (VAT)
- Harmonisation of Accounting Rules
  - ⇒ IAS-Regulation
- No harmonisation of the corporate tax base
  - 25 different methods to calculate the corporate tax base in the EU

## **Consequences**

- Improper functioning of the Internal Market
- Lack of transparency in the tax competition within the EU
- Huge compliance costs for companies operating in more than one EU Member State (MS)
- Lack of crossborder loss-relief
- Transfer pricing problems by transactions within the EU
- Problem of the double taxation within the Internal Market

## **Responses by the EU**

- Home State Taxation as pilot scheme for SMEs, which are operating in at least two MS (for a period of 5 years)
- As a more comprehensive approach:  
Common Consolidated Corporate Tax Base  
Working Group established in 2004

## Home State Taxation

- Calculating only one single tax base for a company operating in at least two MS
- Mainly based on bilateral agreements between MS
- The calculating of the tax base follows the rules of the Home State of the company
- Formula apportionment to the countries involved
- The portions are taxed by the MS

Advantage: Reduction of compliance costs and crossborder loss relief

Disadvantage: No harmonisation of the tax base; still 25 different regulations for calculating the corporate tax base

- With all the following problems

## General Approach of CCCTB

- Focus → tax base, not tax rates
- Goal → one single tax base for a EU-wide operating group
- Starting point → endorsed IAS/IFRS
- Process → one-stage not two stages
  - but three steps
    - common base
    - consolidation
    - reallocation
- Optional not compulsory for companies working in more than one MS

## **IAS/IFRS as starting point**

- IAS/IFRS defines the starting point not the tax base, there is no IAS-dependency
- IAS/IFRS is used as a tool, it provides a common language and a common vocabulary
- Endorsed IAS/IFRS are EU-law and published in all official EU-languages and available for all tax experts
- IAS/IFRS is a constant point of reference and guides the discussion between MS
- But there will be no direct formal link to the constantly changing standards
- Goal ist a seperate set of rules defining the tax base
- CCCTB Working Group follows a problem - and not a principal bases approach

## **Aspects of a CCCTB**

- Common tax base
  - assets and depreciation
  - reserves provisions and liabilities
  - taxable income
  - international aspects
- Consolidation and apportionment
  - consolidation
  - apportionment
- Further aspects
  - structural and legal framework
  - financial institutions

## **Assets and depreciation**

- Tax oriented definitions of
  - assets and beneficial ownership
  - differentiation between tangible and intangible assets
  - depreciation methods
  - measurement  $\Rightarrow$  historical costs no fair value
- Problems
  - individual depreciation or pool depreciation
  - separate depreciation of components like IAS 16
  - separate rules for financial assets
- Remark
  - IAS language and categories very helpful, but tax solutions may be different from IAS 16

## **Reserves provisions and liabilities**

- Reference to IAS 37 is helpful for tax purposes
- But for tax purposes an extra step is required
  - When should a provision be tax deductible?
- There is a discussion about a positive or a negative list
- In my opinion we need a negative list of provisions, which are not tax deductible



## Consolidation

- Goal: One single tax base of a group in the EU
  - accounting approach (IAS 27) not appropriate for tax
  - not starting from the consolidated accounts, but from the single accounts
  - necessary is a tax specific method of consolidation
- Problems:
  - Definition of a group (legal or economic approach)
    - shareholding requirement (from 75%-95%)
    - all or none versus cherry-picking
    - rules for incoming and outgoing entities
  - Mechanics of consolidation
    - consolidation of profits and losses
    - elimination of profits and losses from intragroup transactions
    - minority shareholders

## Apportionment

- Unlikely  $\Rightarrow$  macro-economic factors
- More likely  $\Rightarrow$  micro-economic factors
  - Sales
  - Value added
  - Assets
  - Payroll
  - Combinations
- Experience: United States and Canada
- Analytical problem: traditional criterias do not fit for modern economies?
- Political problem: to achieve an agreement between MS

$\Rightarrow$  Therefore: one-stage process is very fragile

## **Future Perspectives**

- CCCTB Working Group is a technical expert group
- Commission has announced to present a legislative proposal by the end of 2008
- May be a Directive Regulation or more likely an Enhanced Cooperation
- Project is very ambitious
- May be a two-stage process is a reasonable alternative

## **TAX COMPLIANCE FOR SMEs**

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## **TAX COMPLIANCE FOR SMEs**

Tax compliance is expensive

Especially for micro firms

There are a number of taxes that must be complied  
with, both direct and indirect

Taxes on the business, the owner(s), their  
employees

VAT, customs duties etc

Administrative Burdens exercises are seeking to  
reduce compliance costs in a number of states

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## **TAX DRIVES BUSINESS DECISIONS**

Legal Form – Incorporated or Unincorporated  
Dividends or salaries  
Employment vs self-employment  
Thresholds e.g. VAT  
Cross-border trade  
Business transfer  
VAT, customs duties etc  
Evasion or avoidance  
Uncertainty

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## **THE ROLE OF SMPs**

Tax Advisers  
Tax law is complex (even SMPs say this!)  
Assist clients with the “decision process” and  
to cope with uncertainty  
Professional stance  
Where accountants are involved compliance for  
checkable items is higher  
But for uncheckable items compliance is seen as  
more aggressive  
  
Encourage on line filing to reduce compliance costs

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## THE ROLE OF FISCAL AUTHORITIES

The single market  
Simplifying tax codes  
Reduce administrative burdens  
Reduce the impact on business decisions  
Provide rewards for compliant businesses  
Tackle evasion  
Reduce the impact of thresholds  
Consult and provide notice of changes  
Stability

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## Some Recent Papers on Taxation

Derregia M. and Chittenden F, The role of tax incentives in capital investment and research and development expenditure decisions by SMEs; Briefing, Centre for Business Performance, the Institute of Chartered Accountants in England and Wales, March 2006, pp16

Chittenden F and Sloan B, Taxation and Small Firms: An International Literature Review, forthcoming, the Small Business Service, DTI.

Sloan, B and Chittenden, F, Targeting Fiscal Policy to Promote Business Growth Amongst the Self-Employed; Environment and Planning C: Government and Policy, vol 24 (1), January 2006, pp83-98.

Chittenden, F., Kauser, S., and Poutziouris, P., PAYE-NIC Compliance Costs: Empirical Evidence From The UK SME Economy; International Small Business Journal, Vol 23 (6), 2005, pp 635-656.

Chittenden, F, Kauser S and Poutziouris P, The Impact of Tax Regulation on Small Firms in the UK, USA, Australia and New Zealand; International Small Business Journal, vol 21(1), 2003, pp85-106

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## Value Added Tax in the European Union « 2000-2010 - a decade of major change ? »

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### The Commission's current work programme

B to B services	- Reduced rates
	- Public bodies
B to C services	- Postal services-Com (2003) 234
Guichet Unique-Com (2004) 728	- Recast 6th Directive
Financial services	-Tour operators-Com (2002) 64
Fight against fraud	-Anti-avoidance-Com (2005) 89

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## Commission's revised strategy

- New Strategy document in 2006 ?
- Focus on VAT fraud
  - Communication Com (2006) 404
  - Communication Com (2006) 254
- Objectives remain
  - Simplification
  - Modernisation

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## Increased use of the « reverse charge »

- To simplify the tax and limit scope of fraud
- Communication to the Council Com (2006) 404 – fighting fraud
  - Germany,
  - Austria,
  - UK,
  - The Netherlands,
  - France – art 94 – Rectifying Finance Law 2005

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## Increased use of the « reverse charge »

B to B services – fundamental change for existing place of supply rules.

B to C services – prevention of distortions of competition

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## Modernisation

- EU 6th VAT Directive is 30 years old,
- Business has developed, international trade as well
- Directive non longer adapted :
  - Financial services,
  - Postal services,
  - Vouchers, means of payment...

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## Evolution of VAT over the next 10 years :

- Mutual cooperation is a **must**
- Significant problems with VAT system,
- Weaknesses being exploited – perhaps 10% of VAT evaded,
- Social VAT
- Reduced VAT rates – study in progress

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