7.3.2018

Amendment 78
Eva Joly
on behalf of the Verts/ALE Group

Report
Paul Tang
Common Corporate Tax Base

Proposal for a directive
Recital 5 a (new)

Text proposed by the Commission

(5 a) In order to create a level playing field and to eliminate tax competition and the resulting race to the bottom as regards corporate taxation levels, a minimum effective corporate tax rate should be introduced in parallel with the common consolidated corporate tax base so as to avoid transferring unfair competition on the tax base to unfair competition on the tax rates. The Union should therefore adopt, as soon as possible, a minimum common effective corporate tax rate, applicable in each Member State.

Or. en
7.3.2018

Amendment 79
Eva Joly
on behalf of the Verts/ALE Group

Report
Paul Tang
Common Corporate Tax Base

Proposal for a directive
Recital 5 b (new)

Text proposed by the Commission

(5 b) One of the main problems encountered by the tax authorities is the impossibility of gaining access in due time to comprehensive and relevant information about the tax planning strategies of MNEs. Such information should be made publicly available, in order for tax authorities to react quickly to tax risks, by assessing those risks more effectively, targeting checks and alerting about changes required to the legislation in force.

Or. en
7.3.2018

Amendment 80
Eva Joly
on behalf of the Verts/ALE Group

Report
Paul Tang
Common Corporate Tax Base

Proposal for a directive
Recital 8

Text proposed by the Commission

(8) Taxable revenues should be reduced by business expenses and certain other items. Deductible business expenses should normally include all costs relating to sales and expenses linked to the production, maintenance and securing of income. To support innovation in the economy and modernise the internal market, deductions should be provided for research and development costs, including super-deductions, and those should be fully expended in the year incurred (with the exception of immovable property). Small starting companies without associated enterprises which are particularly innovative (a category which will in particular cover start-ups) should also be supported through enhanced super-deductions for research and development costs. In order to ensure legal certainty, there should also be a list of non-deductible expenses.

Amendment

(8) Taxable revenues should be reduced by business expenses and certain other items. Deductible business expenses should normally include all costs relating to sales and expenses linked to the production, maintenance and securing of income. To support innovation in the economy and modernise the internal market, deductions should be provided and taxpayers should receive a tax credit for genuine research and development expenses, relating to expenses in respect of staff, subcontractors, agency workers and freelancers, and those should be fully expended in the year incurred (with the exception of immovable property). A clear definition of genuine research and development expenses is needed to avoid misuse of the deductions. In order to ensure legal certainty, there should also be a list of non-deductible expenses. In addition, in order to avoid financing research and development of new potentially toxic financial instruments and to limit the research and development allowance to key strategic and future-related investments, such related genuine expenses should be non-deductible insofar as they concern financial undertakings.
Amendment 81
Eva Joly
on behalf of the Verts/ALE Group

Report
Paul Tang
Common Corporate Tax Base

Proposal for a directive
Article 9 – paragraph 2 a (new)

Text proposed by the Commission

Amendment

2a. By way of derogation from paragraph 2, expenses for research and development related to the development of new financial products by financial undertakings shall not be deductible.

Or. en
Amendment 82
Eva Joly
on behalf of the Verts/ALE Group

Report
Paul Tang
Common Corporate Tax Base

Proposal for a directive
Article 62 a (new)

Text proposed by the Commission

Amendment

Article 62a
Common minimum effective tax rate
By 31 December 2018, the Commission shall put forward a legislative proposal for a common minimum effective tax rate of at least 20% across Member States.

Or. en