



2020/2254(INL)

16.11.2021

AMENDMENTS

1 - 206

Draft report
Luděk Niedermayer
(PE662.076v01-00)

Fair and simpler taxation supporting the recovery strategy (EP follow-up to the July Commission's Action Plan and its 25 initiatives in the area of VAT, business and individual taxation)
(2020/2254(INL))

Amendment 1

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider, Charlie Weimers, Jessica Stegrud

Motion for a resolution

Citation 6

Motion for a resolution

Amendment

— *having regard to the Commission proposals pending for adoption, in particular on the Common Corporate Tax Base (CCTB) , the Common Consolidated Corporate Tax Base (CCCTB)¹ , and the digital taxation package² , as well as the European Parliament’s positions on these proposals,*

deleted

¹ *Proposal of 25 October 2016 for a Council Directive on a Common Corporate Tax Base (CCTB), COM(2016)0685 and of 25 October 2016 on a Common Consolidated Corporate Tax Base (CCCTB), COM(2016)0683.*

² *The package consists of the Commission communication of 21 March 2018 entitled ‘Time to establish a modern, fair and efficient taxation standard for the digital economy’ (COM(2018)0146), the proposal of 21 March 2018 for a Council directive laying down rules relating to the corporate taxation of a significant digital presence (COM(2018)0147), the proposal of 21 March 2018 for a Council directive on the common system of a digital services tax on revenues resulting from the provision of certain digital services (COM(2018)0148) and the Commission recommendation of 21 March 2018 relating to the corporate taxation of a significant digital presence (C(2018)1650).*

Or. en

Amendment 2

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution
Citation 16 a (new)

Motion for a resolution

Amendment

— *having regard to the European Parliament's report on the implementation of the EU requirements for exchange of tax information: progress, lessons learnt and obstacles to overcome (2020/2046(INI)),*

Or. en

Amendment 3

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution
Citation 20 a (new)

Motion for a resolution

Amendment

— *having regard to the resolution of the European Parliament on the implementation of the EU requirements for exchange of tax information: progress, lessons learnt and obstacles to overcome (2020/2046(INI)),*

Or. en

Amendment 4

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution
Citation 18 a (new)

Motion for a resolution

Amendment

— *having regard to its resolution of 16 September 2021 on the implementation*

of the EU requirements for exchange of tax information: progress, lessons learnt and obstacles to overcome,

Or. en

Amendment 5

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Citation 16 b (new)

Motion for a resolution

Amendment

— *having regard to the European Parliament's report on reforming the EU policy on harmful tax practices (including the reform of the Code of Conduct Group) (2020/2258(INI)),*

Or. en

Amendment 6

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Recital A

Motion for a resolution

Amendment

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures *to protect society and the economy*, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of public finances and taxation systems; whereas it is paramount to keep taxes low to support the growth of the economy;

A. whereas the unprecedented impact and magnitude of the *national and regional lockdowns and other measures that have restricted economic activity, following the* COVID-19 crisis, on the economy, has led to a decrease in tax revenues and an increase in fiscal expenditures, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of public finances and taxation systems; whereas it is paramount to keep taxes low to support the growth of the economy;

Amendment 7

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Recital A

Motion for a resolution

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of public finances and taxation systems; whereas it is paramount to **keep taxes low** to support **the growth of the economy**;

Amendment

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in **debt and** fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability **and digitalisation** of public finances and taxation systems; whereas it is paramount to **focus on the economic and social recovery of the Union and** to support **jobs and growth while discouraging increase in tax**;

Amendment 8

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital A

Motion for a resolution

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of

Amendment

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax **avoidance, tax** fraud and tax evasion undermines government revenues, as well

public finances and taxation systems;
whereas *it is paramount to keep taxes low to support the growth* of the economy;

as the sustainability of public finances and taxation systems; whereas *the economic recovery and the challenges related to the climate crisis, ageing population, the ecological transition and the digitisation of the economy involve very profound changes and increase the need to mobilise more resources and re-evaluate current taxation policies, in particular the many loopholes embedded in complex national taxation policies, so that this transition is fair*;

Or. en

Amendment 9

Marek Belka, Niels Fuglsang, Aurore Lalucq, Paul Tang, Jonás Fernández

Motion for a resolution

Recital A

Motion for a resolution

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud *and* tax evasion *undermines* government revenues, as well as the sustainability of public finances *and* taxation systems; whereas it is paramount to keep taxes low to support the growth of the economy;

Amendment

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud, tax evasion *and tax avoidance undermine* government revenues, as well as the sustainability of public finances, taxation systems *and tax fairness*; whereas it is paramount to keep taxes low to support the *sustainable* growth of the economy, *while not undermining a sufficient income to the budget*;

Or. en

Amendment 10

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Recital A

Motion for a resolution

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of public finances and taxation systems; whereas ***it is paramount to keep taxes low to support the growth of the economy;***

Amendment

A. whereas the unprecedented impact and magnitude of the COVID-19 crisis on the economy has led to a decrease in tax revenues and an increase in fiscal expenditures to protect society and the economy, and is leading to a sharp increase in government debt; whereas tax fraud and tax evasion undermines government revenues, as well as the sustainability of public finances and taxation systems; whereas ***throughout European history, when facing crisis, some countries greatly modified their taxation system, for example France introduced an excess profit tax during World War I, which sometimes led to a long-term modification of their taxation system;***

Or. en

Amendment 11

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital A a (new)

Motion for a resolution

A a. whereas the tax incidence has shifted from wealth to income, from capital to labour income and consumption, from MNEs to SMEs, and from the financial sector to the real economy, thus becoming more regressive; whereas this shift in the tax burden from more mobile to less mobile taxpayers results in a lower average tax burden for the very rich income;

Or. en

Amendment 12

Motion for a resolution

Recital A a (new)

Motion for a resolution

Amendment

A a. whereas in 2020, tax revenue in the Union fell by EUR 215 billion compared to 2019, while at the same time the tax-to-GDP ration has increased from 41.1 to 41.3%^{1a};

1a

<https://ec.europa.eu/eurostat/en/web/products-eurostat-news/-/ddn-20211029-2>

Or. en

Amendment 13

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital B

Motion for a resolution

Amendment

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for businesses, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing ***both*** trust in society ***and fair competition***;

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for businesses, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple, ***fairer*** and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery, ***the ecological transition to a carbon-neutral economy*** and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing ***tax morale and*** trust in society; ***whereas tax morale is generally higher in countries that tax more heavily, which is evident in the willingness of citizens to pay tax in return for effective public services^{1a};***

^{1a} <https://www.oecd-ilibrary.org/sites/0533eea9-en/index.html?itemId=/content/component/0533eea9-en>

Or. en

Amendment 14

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Recital B

Motion for a resolution

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for businesses, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing both trust in society and fair competition;

Amendment

B. whereas a swift recovery requires a strong economic and fiscal policy response ***through reforms and investments*** ensuring, inter alia: (i) an effective level playing field for businesses, including less red tape to promote ***competition, as well as*** both domestic trade and trade within the Single Market, supported by a simple, ***digital*** and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing ***transparency and*** both trust in society and fair competition ***through coordinated and digitalised reporting systems***;

Or. en

Amendment 15

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Jonás Fernández

Motion for a resolution

Recital B

Motion for a resolution

B. whereas a swift recovery requires a

Amendment

B. whereas a swift recovery requires a

strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for **businesses**, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and **reduce** debt to GDP and (iii) fair taxation of businesses and citizens, enhancing both trust in society and fair competition;

strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for **tax payers**, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and **boost investments that will support the reduction in the** debt to GDP **ratio** and (iii) fair taxation of businesses and citizens, enhancing both trust in society and fair competition;

Or. en

Amendment 16

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Recital B

Motion for a resolution

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for businesses, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing **both** trust in society **and fair competition**;

Amendment

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) an effective level playing field for businesses, **reducing or eliminating tax benefits that unfairly create disadvantages to SMEs**, including less red tape to promote both domestic trade and trade within the Single Market, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt to GDP and (iii) fair taxation of businesses and citizens, enhancing trust in society;

Or. en

Amendment 17

Gunnar Beck, Maximilian Krah, Roman Haider

Motion for a resolution

Recital B

Motion for a resolution

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) ***an effective level playing field for businesses, including less red tape to promote both domestic trade and trade within the Single Market,*** supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt ***to GDP*** and (iii) fair taxation of businesses and citizens, enhancing ***both trust in society and fair competition;***

Amendment

B. whereas a swift recovery requires a strong economic and fiscal policy response ensuring, inter alia: (i) less red tape, supported by a simple and more predictable tax environment; (ii) securing tax revenues for Member States to finance the recovery and reduce debt and (iii) fair taxation of businesses and citizens, enhancing ***domestic investment, domestic production and domestic demand;***

Or. en

Amendment 18

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Recital C

Motion for a resolution

C. whereas the Commission's Action Plan is part of a wider Union tax strategy in the area of VAT, business and individual taxation; whereas the Action Plan sets out a dual approach combining actions for combating tax fraud and tax evasion and simplifying steps to remove unnecessary obstacles and administrative burdens for ***taxpayers;***

Amendment

C. whereas the Commission's Action Plan is part of a wider Union tax strategy in the area of VAT, business and individual taxation; whereas the Action Plan sets out a dual approach combining actions for combating tax fraud and tax evasion and simplifying steps to remove unnecessary obstacles and administrative burdens for ***citizens and SMEs;***

Or. en

Amendment 19

José Manuel García-Margallo y Marfil, Isabel Benjumea Benjumea

Motion for a resolution

Recital C a (new)

Motion for a resolution

Amendment

Ca. whereas SMEs make up 99% of businesses in the EU and create two out of three private-sector jobs, but the cost of compliance with tax rules accounts for 30% of their tax burden, while for large companies it is only 2%.

Or. es

Amendment 20
Hélène Laporte

Motion for a resolution
Recital C a (new)

Motion for a resolution

Amendment

Ca. whereas the EU has been late to wake up to tax fraud and tax evasion given the repeated scandals that have come to light since 2015 involving several EU Member States, including a founding member;

Or. fr

Amendment 21
Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution
Recital D

Motion for a resolution

Amendment

D. whereas there is a need to build more mutual trust and cooperation between the tax authorities of the Member States and share best practices across the Member States;

D. whereas there is a need to build more mutual trust and cooperation between the tax authorities of the Member States and share best practices across the Member States ***in view of consolidating and harmonising national reporting systems;***

Or. en

Amendment 22
Hélène Laporte

Motion for a resolution
Recital D a (new)

Motion for a resolution

Amendment

Da. whereas the information-sharing obligations should be supported in their objective of combating tax fraud, avoidance and evasion by more effective cooperation between Member States, but the exchange of information is sometimes hampered by delays or incompleteness of the information sent, limiting the efficiency of the system.

Or. fr

Amendment 23
José Manuel García-Margallo y Marfil, Isabel Benjumea Benjumea

Motion for a resolution
Recital D a (new)

Motion for a resolution

Amendment

Da. whereas the European Court of Auditors' 2021 Special Report on Exchanging Tax Information in the EU¹ found the information exchanged by Member States to be outdated, inaccurate and incomplete.

¹ Special Report No 03/2021 of the European Court of Auditors of 26 January 2021 'Exchanging tax information in the EU: solid foundation, cracks in the implementation'.

Or. es

Amendment 24
Hélène Laporte

Motion for a resolution
Recital E

Motion for a resolution

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events;

Amendment

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events, ***which should not, however, lead to corporation tax harmonisation but rather a minimum threshold for that tax;***

Or. fr

Amendment 25
Markus Ferber

Motion for a resolution
Recital E

Motion for a resolution

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events;

Amendment

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation ***and a stronger reliance on intangible assets*** create a challenge in terms of traceability of economic operations and taxable events;

Or. en

Amendment 26
Luděk Niedermayer

Motion for a resolution
Recital E

Motion for a resolution

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events;

Amendment

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events, ***especially when these operations are cross-border or take place outside the Union;***

Or. en

Amendment 27

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital E

Motion for a resolution

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create a challenge in terms of traceability of economic operations and taxable events;

Amendment

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation ***and the increase of intangible assets in value chains*** create a challenge in terms of traceability of economic operations and taxable events ***and facilitate tax avoidance practices;***

Or. en

Amendment 28

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Recital E

Motion for a resolution

Amendment

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create **a challenge** in terms of traceability of economic operations and taxable events;

E. whereas current international corporate tax rules are no longer suitable in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create **opportunities and challenges** in terms of traceability of economic operations and taxable events;

Or. en

Amendment 29

Gunnar Beck, Gerolf Annemans, Maximilian Krah, H el ene Laporte, Roman Haider

Motion for a resolution

Recital E

Motion for a resolution

E. whereas current international corporate tax rules **are no longer suitable** in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create **a challenge in terms of traceability of economic operations and taxable events**;

Amendment

E. whereas current international corporate tax rules **need to be updated** in the context of digitalisation and globalisation of the economy; whereas developments of digitalisation create **fiscal challenges**;

Or. en

Amendment 30

Gunnar Beck, Maximilian Krah, Roman Haider

Motion for a resolution

Recital F

Motion for a resolution

F. whereas corporate taxation should be guided by the principle of taxing profits where they are generated, a coordinated approach to the corporate taxation system across the Union could further enable the tackling of unfair competition caused by harmful tax practices that **distort the functioning of the single market and** often lead to misallocation of resources;

Amendment

F. whereas corporate taxation should be guided by the principle of taxing profits where they are generated, a coordinated approach to the corporate taxation system across the Union could further enable the tackling of unfair competition caused by harmful tax practices that often lead to misallocation of resources;

Amendment 31

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital F

Motion for a resolution

F. whereas corporate taxation should be guided by the principle of taxing profits where they are generated, a coordinated approach to the corporate taxation system across the Union could ***further enable the tackling of unfair competition caused by harmful tax practices that distort the functioning of the single market and often lead to misallocation of resources;***

Amendment

F. whereas corporate taxation should be guided by the principle of taxing profits where they are generated, a ***harmonised and*** coordinated approach to the corporate taxation system across the Union could ***put an end to tax*** competition ***and*** harmful tax practices ***in the corporate income tax field and therefore secure a well-functioning*** single market;

Or. en

Amendment 32

Luděk Niedermayer

Motion for a resolution

Recital G

Motion for a resolution

G. whereas increased transparency in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

Amendment

G. whereas increased transparency in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public; ***points out that progress made with digitalisation for both taxpayers and tax authorities opens alternatives on how to systematically***

address certain tax fraud;

Or. en

Amendment 33

Markus Ferber

Motion for a resolution

Recital G

Motion for a resolution

G. whereas **increased transparency** in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

Amendment

G. whereas **better cooperation between Union tax authorities** in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

Or. en

Amendment 34

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Recital G

Motion for a resolution

G. whereas increased transparency in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and

Amendment

G. whereas increased transparency in the area of corporate taxation can improve tax collection, **increase tax compliance** and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can

transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public; *whereas the use of technology and digitalisation can also facilitate the taxation of mobile tax bases;*

Or. en

Amendment 35

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Recital G

Motion for a resolution

G. whereas increased transparency in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

Amendment

G. whereas increased transparency in the area of corporate taxation can improve tax collection and is also necessary to strengthen fair competitiveness in the single market, which will make the work of tax authorities more efficient; whereas the *final agreement on the public country-by-country reporting is far from being enough as it will not provide disaggregated data for more than 80% of the countries in the world; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;*

Or. en

Amendment 36

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Hélène Laporte, Roman Haider

Motion for a resolution

Recital G

Motion for a resolution

G. whereas increased transparency in

Amendment

G. whereas increased transparency in

the area of *corporate* taxation can improve tax collection **and is also necessary to strengthen fair competitiveness in the single market**, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

the area of taxation **of corporates, non-financial entities (NFEs) and high-net worth individuals (HNWIs)** can improve tax collection, which will make the work of tax authorities more efficient; whereas the use of technology and digitalisation focused on a more efficient use of the available data can support efficiency and transparency of tax authorities and reduce the costs of compliance and increase the trust of the public;

Or. en

Amendment 37
Hélène Laporte

Motion for a resolution
Recital G a (new)

Motion for a resolution

Amendment

Ga. whereas the Code of Conduct Group has, worryingly, made several missteps since its establishment in 1998 and failed to issue any recommendations promoting fair tax competition within the EU but has allowed harmful tax practices to flourish, such as Luxembourg's tax rulings;

Or. fr

Amendment 38
José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 1

Motion for a resolution

Amendment

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, **which is appropriate** due to the high level of

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, due to the high level of revenue losses in the area

revenue losses in the area of VAT; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

of VAT; ***supports the effort of reducing the VAT gap in order to prevent the possible need to increase the tax rates on consumption***; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses; ***stresses, however, that the Commission's Action Plan should have also a focus on corporate taxation and anti-money laundering mechanisms in alignment with the international momentum***;

Or. en

Amendment 39

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 1

Motion for a resolution

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Amendment

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses; ***is concerned that urgently needed VAT reforms such as the definitive VAT regime and coordination of rates remain blocked in Council due to unanimity in tax matters***;

Or. en

Amendment 40

Marek Belka, Alfred Sant, Aurore Lalucq, Pedro Marques, Jonás Fernández

Motion for a resolution

Paragraph 1

Motion for a resolution

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; ***considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;***

Amendment

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT ***and the need to support business, especially SMEs;***

Or. en

Amendment 41

Hélène Laporte

Motion for a resolution

Paragraph 1

Motion for a resolution

1. ***Welcomes the Commission's Action Plan and supports its thorough implementation;*** observes that the majority of the 25 actions are related to VAT, which ***is*** appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Amendment

1. observes that the majority of the 25 actions are related to VAT, which ***appears*** appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Or. fr

Amendment 42

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel

Motion for a resolution

Paragraph 1

Motion for a resolution

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out, **before presenting** concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Amendment

1. Welcomes the Commission's Action Plan and supports its thorough implementation; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers however that an impact assessment should be carried out **to complement** concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Or. en

Amendment 43

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 1

Motion for a resolution

1. **Welcomes** the Commission's Action Plan **and supports its thorough implementation**; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers **however** that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Amendment

1. **Takes note of** the Commission's Action Plan; observes that the majority of the 25 actions are related to VAT, which is appropriate due to the high level of revenue losses in the area of VAT; considers **it absolutely crucial** that an impact assessment should be carried out, before presenting concrete legislative proposals to better apprehend the potential effects on taxpayers and businesses;

Or. en

Amendment 44

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 1 a (new)

1 a. Underlines that regressive taxes such as VAT show an upward trend in the Union and represent 7,1% of GDP, whereas fairer taxes such as corporate taxes are decreasing and represent only 2,8% of GDP; stresses that this trend does not go in the right direction as the gap between those figures was one percentage point lower in 2006;

Or. en

Amendment 45

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 2

Motion for a resolution

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities ***and increased harmonisation of procedural rules across the single market*** is of the highest importance; ***welcomes the Commission's initiative for the 'EU cooperative compliance programme'***;

Amendment

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities is of the highest importance;

Or. en

Amendment 46

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 2

Motion for a resolution

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax

Amendment

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax

authorities and increased harmonisation of procedural rules across the single market is of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme';

authorities and increased harmonisation of procedural rules across the single market is of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme' *as a method of closer cooperation between tax authorities and business and recommends clear eligibility and functioning rules, as well as a potential expansion of the programme towards VAT-related issues;*

Or. en

Amendment 47

Martin Hlaváček, Ondřej Kovařík

Motion for a resolution

Paragraph 2

Motion for a resolution

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities and increased **harmonisation** of procedural rules across the single market is of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme';

Amendment

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities and increased **coordination** of procedural rules across the single market is of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme';

Or. en

Amendment 48

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 2

Motion for a resolution

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities and increased harmonisation of procedural rules across the single market is

Amendment

2. Believes that the Commission's decision to carry out initiatives aimed at enhancing cooperation among tax authorities and increased harmonisation of procedural rules across the single market is

of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme';

of the highest importance; welcomes the Commission's initiative for the 'EU cooperative compliance programme'; **welcomes and looks forward to the Commission's proposals to harmonise withholding tax procedures and tax residence criteria;**

Or. en

Amendment 49

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 3

Motion for a resolution

3. Welcomes the Commission's proposal to modernise, simplify and harmonise VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best practices among Member States;

Amendment

3. Welcomes the Commission's proposal to modernise, simplify and harmonise VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best practices among Member States; **however, stresses that, according to a study requested by TAX 3 in 2018^{1a}, no data is collected regarding business activity in Member States that do not participate in it, and that each participating Member State is allowed to set a 'white list' of actors in respect of which the TNA will not be able to collect VIES and VOW data;**

^{1a} **LAMENSCH M. and CECI E. (2018)**

Amendment 50
Gunnar Beck, Maximilian Krah, Roman Haider

Motion for a resolution
Paragraph 3

Motion for a resolution

3. **Welcomes** the Commission's proposal to modernise, simplify **and harmonise** VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; **considers that reporting requirements and tax forms should converge across the Member States**; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best practices among Member States;

Amendment

3. **Takes note of** the Commission's proposal to modernise **and** simplify VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best practices among Member States;

Amendment 51
Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution
Paragraph 3

Motion for a resolution

Amendment

3. Welcomes the Commission's proposal to modernise, simplify and harmonise VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents **an** available **way** to reduce tax fraud and promotes its further development and sharing of best practices among Member States;

3. Welcomes the Commission's proposal to modernise, simplify and harmonise VAT requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents **one of the** available **options** to reduce tax fraud and promotes its further development and sharing of best practices among Member States;

Or. en

Amendment 52 **Hélène Laporte**

Motion for a resolution **Paragraph 3**

Motion for a resolution

3. Welcomes the Commission's proposal to modernise, **simplify and harmonise VAT** requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best

Amendment

3. Welcomes the Commission's proposal to modernise **and simplify VAT** requirements, using transaction-based 'real time' reporting and e-invoicing; notes that such reporting needs to be taxpayer-friendly while allowing tax administrations to have an overview of the various transactions in real-time, facilitating the prevention and detection of fraud and risky economic operators; considers that reporting requirements and tax forms should converge across the Member States; believes that the use of the data-mining tool Transaction Network Analysis (TNA) represents an available way to reduce tax fraud and promotes its further development and sharing of best practices among

practices among Member States;

Member States;

Or. fr

Amendment 53

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 4

Motion for a resolution

4. ***Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses;*** stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, ***but only data effectively used, and collected from taxpayers only once with utmost security, should be collected;*** notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Amendment

4. Stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, collected ***in a way that respects*** taxpayers security; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Or. en

Amendment 54

Luděk Niedermayer

Motion for a resolution

Paragraph 4

Motion for a resolution

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting

Amendment

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting

requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, **but only data effectively used, and collected from taxpayers only once with utmost security, should be collected**; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed; **insists on the principle that any data gathered by the tax authorities from the taxpayers must be provided to the Member States only once, with utmost security and respect for data protection laws**; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Or. en

Amendment 55 **Markus Ferber**

Motion for a resolution **Paragraph 4**

Motion for a resolution

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers only once with utmost security, should be collected; notes **that data should aim to** simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Amendment

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers only once with utmost security, should be collected; notes **the potential of data and digital tools to cut red tape and** simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of

data;

Or. en

Amendment 56

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 4

Motion for a resolution

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers only once with utmost security, should be collected; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Amendment

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers only once with utmost security, should be collected; notes that data should aim to simplify various obligations of taxpayers, *in particular in the area of VAT returns and recapitulative statements*, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Or. en

Amendment 57

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 4

Motion for a resolution

Amendment

4. **Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses;** stresses that **the** reporting requirements should **not generate** higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers **only once with utmost security**, should be collected; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

4. Stresses that **tax** reporting requirements should **avoid generating significantly** higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, but only data effectively used, and collected from taxpayers **in line with taxpayers' rights** should be collected; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Or. en

Amendment 58

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Jonás Fernández

Motion for a resolution

Paragraph 4

Motion for a resolution

4. Recalls that any tax measures, temporary or not, should **foster and not hamper the competitiveness of European businesses;** stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, **but only data effectively used, and collected from taxpayers only once with utmost security, should be collected;** notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of

Amendment

4. Recalls that any tax measures, temporary or not, should **avoid distorting investment decisions and should act as a tool in supporting the fulfilment of Union goals such as the Green Deal, social justice or digitalisation of the European economy;** stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that **in order** to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of

data;

data;

Or. en

Amendment 59

Andżelika Anna Możdżanowska

Motion for a resolution

Paragraph 4

Motion for a resolution

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, ***but only data effectively used, and collected from taxpayers only once with utmost security, should be collected***; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Amendment

4. Recalls that any tax measures, temporary or not, should foster and not hamper the competitiveness of European businesses; stresses that the reporting requirements should ***therefore*** not generate higher administrative costs for economic actors, notably for small and medium-sized enterprises (SMEs); notes that to effectively address lost tax revenues, better quality and possible higher quantities of data may be needed, ***which should, however, be obtained once and only if they are necessary, while ensuring their effective use and an appropriate level of security***; notes that data should aim to simplify various obligations of taxpayers, while artificial intelligence (AI) and various softwares should be used to maximise the effectiveness of the use of data;

Or. pl

Amendment 60

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 4 a (new)

Motion for a resolution

Amendment

4 a. Notes that revenue loss in the Union due to international tax evasion by

individuals, covering personal income tax, capital income taxes and wealth and inheritance taxes, has been estimated at EUR 46 billion in 2016; observes the current distortions of the single market due to an increasing and unregulated tax competition in the field of personal income, capital and wealth taxation; notes the ongoing competition in the Union for high net-worth individuals through preferential regimes such as expatriate and investment regimes; also notes the competition for pensioners and so-called ‘digital nomads’; underlines that tax competition for ‘digital nomads’ has accelerated due to telework in response to the COVID-19 crisis; highlights the inconsistencies in capital gains taxation across Europe and the negative fiscal spillovers resulting therefrom such as rewarding speculation; deeply deplores therefore that distortions in the area of personal income, capital gains, wealth and inheritance taxation were not translated in concrete actions in the Commission’s Action Plan;

Or. en

Amendment 61
Luděk Niedermayer

Motion for a resolution
Paragraph 4 a (new)

Motion for a resolution

Amendment

4 a. Underlines that diversity of the Member States tax regulations constitutes a cumbersome challenge, particularly for SMEs and start-ups operating or willing to start trading in the Single Market, having to cope with up to 27 different tax systems. Due care should be devoted to higher compliance costs sustained by SMEs, compared to larger businesses; notes that the European Commission has estimated that tax compliance costs for

large companies taxes amount to about 2% of their income, whereas for SMEs the estimate is about 30%; stresses that SMEs should not be further penalised by the financial burden associated with operating under different national systems and the benefits of the single market should be easily accessible;

Or. en

Amendment 62

Paul Tang, Pedro Marques, Marek Belka

Motion for a resolution

Paragraph 4 a (new)

Motion for a resolution

Amendment

4 a. Highlights that a sustainable recovery strategy should consider the ongoing low interest rates and increasing inflation across the Union; is concerned that under these economic circumstances, the tax burden increasingly moves from capital gains towards labour; considers high mobile workers to constitute a further complication; calls upon the Commission to assess policy measures in the area of personal income taxation, such as a minimum tax rate, wealth tax and inheritance tax, to ensure a fair allocation of taxes among Member States and a fair distribution of the tax burden among its citizens;

Or. en

Amendment 63

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Paragraph 4 a (new)

Motion for a resolution

Amendment

4 a. Reiterates the importance of NextGenerationEU funds for the economic recovery of the Union and highlights the opportunity to use the Recovery and Resilience Facility to pursue fiscal reforms and investments into a sustainable and digitalised fiscal system;

Or. en

Amendment 64

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 4 b (new)

Motion for a resolution

Amendment

4 b. Calls for greater alignment and administrative cooperation of capital gains taxation in the Union; calls on the Member States' Ministers of Finance to finally agree on the reform of the 1997 EU Code of Conduct on Business Taxation and expand it beyond corporate income taxation to tax competition for individuals in the Union; invites the Commission, in the framework of the upcoming Tax Symposium in 2022, to map all divergences in the tax systems of Member States and flag all possible distortions and develop a concrete action plan to tackle those distortions;

Or. en

Amendment 65

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 4 b (new)

Motion for a resolution

Amendment

4 b. Recalls that the Fiscalis program for the period 2021-2027, with a budget of EUR 269 million, aims to fight tax injustice by helping national tax authorities to cooperate better to combat tax fraud, tax evasion and aggressive tax planning;

Or. en

Amendment 66

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 5

Motion for a resolution

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses;

Amendment

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses; **highlights that better availability of data, by companies, individuals and tax administrations, can significantly contribute to better estimates; deplores that certain Member States such as Ireland and the Netherlands do not disclose their CbCR data fully at national level and in particular in the OECD Corporate Tax Statistics database; deplores further that Member States have not shared the needed information with the European Parliament in the framework of the DAC Implementation report; welcomes the adoption of the public country-by-country reporting proposal;**

Or. en

Amendment 67

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 5

Motion for a resolution

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses;

Amendment

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses; ***calls on the Commission to launch a coordinated effort by the Member States to establish a joint system of collecting statistics on VAT ‘carousel fraud’; points out that such a system could build upon practices already used in some Member States;***

Or. en

Amendment 68

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 5

Motion for a resolution

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses;

Amendment

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses; ***welcomes the creation of the EU tax observatory and recommends the Commission to find means to perpetuate this action that was initiated by a pilot project of the Union annual budget;***

Or. en

Amendment 69

Luděk Niedermayer

Motion for a resolution

Paragraph 5

Motion for a resolution

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses;

Amendment

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses; ***notes that data on overall tax losses should be further analysed and compiled;***

Or. en

Amendment 70

Andżelika Anna Mozdżanowska

Motion for a resolution

Paragraph 5

Motion for a resolution

5. Is of the opinion that better estimates of overall tax losses in the Union are essential for efficient proposals on ways to effectively reduce tax losses;

Amendment

5. Is of the opinion that better estimates of overall tax losses in the Union ***and a detailed investigation of their systemic causes*** are essential for efficient proposals on ways to effectively reduce tax losses;

Or. pl

Amendment 71

Dragoş Pişlaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 6

Motion for a resolution

6. Recalls that tax transparency and certainty based on clear respective rights and duties is the main principle on which to build mutual trust between taxpayers; supports, in that context, the formalisation of the Charter on taxpayer's rights; believes that further development and the identification of gaps in effective European dispute resolution mechanism need to be

Amendment

6. Recalls that tax transparency and certainty based on clear respective rights and duties is the main principle on which to build mutual trust between taxpayers; supports, in that context, the formalisation of the Charter on taxpayer's rights, ***more consistency on tax residence rules for individuals and an increased exchange of information;*** believes that further

considered;

development and the identification of gaps in effective European dispute resolution mechanism need to be considered;

Or. en

Amendment 72

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 6

Motion for a resolution

6. Recalls that tax transparency and certainty based on clear respective rights and duties is the main principle on which to build mutual trust between taxpayers; supports, in that context, the formalisation of the Charter on taxpayer's rights; believes that further development and the identification of gaps in effective European dispute resolution mechanism need to be considered;

Amendment

6. Recalls that tax transparency, ***fairness*** and certainty based on clear respective rights and duties is the main principle on which to build mutual trust between taxpayers ***and tax administrations***; supports, in that context, the formalisation of the Charter on taxpayer's rights; believes that further development and the identification of gaps in effective European dispute resolution mechanism need to be considered;

Or. en

Amendment 73

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 6 a (new)

Motion for a resolution

Amendment

6 a. Notes that Member States are legally bound to send data only for those categories for which information is already available and as a consequence there is still a general lack of information concerning certain categories of income and assets; calls on the Commission to extend the automatic exchange of

information to crypto-assets (DAC8);

Or. en

Amendment 74

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang

Motion for a resolution

Paragraph 6 a (new)

Motion for a resolution

Amendment

6 a. Considers that tax certainty would be reinforced if Member States had a common understanding of what tax incentives are not distortive; calls on the Commission to issue guidelines on tax incentives that are not distortive for the Single Market;

Or. en

Amendment 75

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 6 b (new)

Motion for a resolution

Amendment

6 b. Welcomes the actions undertaken by the Commission in the area of prevention and resolution of double VAT taxation disputes; notes that such disputes are likely to increase due to emerging economic trade models;

Or. en

Amendment 76

Hélène Laporte

Motion for a resolution

Paragraph 7

Motion for a resolution

Amendment

7. *Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;*

deleted

Or. fr

Amendment 77

Gunnar Beck, Gerolf Annemans, Maximilian Krah, H el ene Laporte, Roman Haider, Charlie Weimers, Jessica Stegrud

Motion for a resolution

Paragraph 7

Motion for a resolution

Amendment

7. *Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;*

7. **Recalls that** tax policy is a national prerogative and subject to unanimity;

Or. en

Amendment 78

Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 7

Motion for a resolution

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Amendment

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”; ***deplores the fact that proposals such as CCCTB, revision of the interest and royalty directive and the reform of the Code of Conduct on Business Taxation have remained blocked in the Council;***

Or. en

Amendment 79
Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution
Paragraph 7

Motion for a resolution

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the

Amendment

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations ***and to a delay in harmonisation of tax practices across the Union;*** calls on the Commission and the Member States to ensure more harmonised

functioning of the single market and to assure the principle of “taxing where profit is generated”;

and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Or. en

Amendment 80

Martin Hlaváček, Ondřej Kovařík

Motion for a resolution

Paragraph 7

Motion for a resolution

7. Notes that ***the Union decision-making process is not promoting change, as*** tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more ***harmonised and*** consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Amendment

7. Notes that tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Or. en

Amendment 81

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 7

Motion for a resolution

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an

Amendment

7. Notes that the Union decision-making process is not promoting change, as tax policy is a national prerogative and subject to unanimity; ***recalls the existence of Article 116 TFEU***; regrets that the

uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Or. en

Amendment 82

Andżelika Anna Możdżanowska

Motion for a resolution Paragraph 7

Motion for a resolution

7. Notes that ***the Union decision-making process is not promoting change, as*** tax policy is a national prerogative and subject to unanimity; ***regrets that*** the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ***ensure*** more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Amendment

7. Notes that tax policy is a national prerogative and subject to unanimity, ***and that this guiding principle should be maintained, even though*** the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ***reach a consensus on ensuring*** more harmonised and consistent tax rules and their implementation, to protect the functioning of the single market and to assure the principle of “taxing where profit is generated”;

Or. pl

Amendment 83

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution Paragraph 7

Motion for a resolution

7. Notes that the Union decision-making process is not promoting change,

Amendment

7. Notes that the Union decision-making process is not promoting change,

as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to ***protect the functioning of the single market and to assure the principle of “taxing where profit is generated”***;

as tax policy is a national prerogative and subject to unanimity; regrets that the current situation sometimes leads to an uneven or inconsistent application of tax regulations; calls on the Commission and the Member States to ensure more harmonised and consistent tax rules and their implementation, to assure the principle of “taxing where profit is generated”;

Or. en

Amendment 84
Hélène Laporte

Motion for a resolution
Paragraph 7 a (new)

Motion for a resolution

Amendment

7a. Expresses concern at the shift of decision-making power in tax matters towards non-state actors or the EU, with the Commission and the Council assuming the right to require a state to freeze or even dismantle legislation they deem harmful.

Or. fr

Amendment 85
Hélène Laporte

Motion for a resolution
Paragraph 8

Motion for a resolution

Amendment

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially in order to ensure functionality of the single market and preserve Union

deleted

competitiveness in the global market;

Or. fr

Amendment 86

Dragoş Pişlaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Paragraph 8

Motion for a resolution

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation *especially* in order to ensure functionality of the single market and preserve Union competitiveness in the global market;

Amendment

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation, *in particular the transition towards qualified majority voting*, in order to ensure functionality of the single market and preserve Union competitiveness in the global market; *calls on the Conference on the Future of Europe to further explore the decision-making process of the taxation policies, in the context of the protection of the Union's financial interests;*

Or. en

Amendment 87

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 8

Motion for a resolution

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially in order to ensure functionality of the single market and preserve Union competitiveness in the global market;

Amendment

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially in order to ensure functionality of the single market and preserve Union competitiveness in the global market; *recalls in this respect the Commission's communication towards more efficient*

and democratic decision making in EU tax policy; deplores that article 116 TFEU, although suggested in the Commission's Action Plan, has not yet been used in tax matters;

Or. en

Amendment 88
Martin Hlaváček, Ondřej Kovařík

Motion for a resolution
Paragraph 8

Motion for a resolution

8. Takes note of the existing *limits on* decision making in the Council *and calls for exploring all legal options as provided in the Treaties on taxation especially in order to ensure functionality of the single market and preserve Union competitiveness in the global market;*

Amendment

8. Takes note of the existing decision making *on taxation matters* in the Council.

Or. en

Amendment 89
José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 8

Motion for a resolution

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially *in order to ensure functionality of the single market and preserve Union competitiveness in the global market;*

Amendment

8. Takes note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially *to fight harmful competition practices;*

Or. en

Amendment 90

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 8

Motion for a resolution

8. Takes *note of the existing limits on decision making in the Council and calls for exploring all legal options as provided in the Treaties on taxation especially in order to ensure functionality of the single market and preserve Union competitiveness in the global market;*

Amendment

8. *Underlines that the European Parliament takes the rule of law very seriously; therefore denounces any attempt to circumvent its own Treaty rules by advocating avoiding the unanimity principle in tax matters; believes that Institutions that preach the importance of the rule of law should live by it;*

Or. en

Amendment 91

Andżelika Anna Mozdżanowska

Motion for a resolution

Paragraph 8

Motion for a resolution

8. Takes note of the existing limits on decision making in the Council and calls for *exploring all legal options as provided in the Treaties on taxation especially in order* to ensure functionality of the single market and preserve Union competitiveness in the global market;

Amendment

8. Takes note of the existing limits on decision making in the Council and calls for *the principle of unanimity in tax matters laid down in the Treaties to be complied with when seeking solutions* to ensure functionality of the single market and preserve Union competitiveness in the global market;

Or. pl

Amendment 92

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 8 a (new)

8 a. *Welcomes the proposal for a Eurofisc 2.0 in the Commission’s Action Plan; strongly supports the Commission’s suggestion to expand it to direct taxation; supports Eurofisc in becoming a Union hub for tax information serving not only VAT purposes, but also financial market authorities, customs, OLAF and Europol; suggests connecting this legislative initiative to the developments in the area of anti-money laundering and in particular the proposed new Union authority to fight money laundering; reiterates, in this context, the recommendations from its resolution of 16 September 2021 on the implementation of the EU requirements for exchange of tax information: progress, lessons learnt and obstacles to overcome; notes that Eurofisc 2.0 could greatly contribute to the effective use by tax administrations of the tax information exchanged and the quality of information exchanged;*

Or. en

Amendment 93
Jonás Fernández

Motion for a resolution
Paragraph 8 a (new)

8 a. *Insists that the future legislative reforms on tax policy should be carried out under the provisions of the TFEU (such as Article 116) allowing decision-making in the Council to be more efficient, such as qualified majority voting; highlights further that, to the extent that unanimity has already occurred (in the context of the NGEU) on a reduced set of new own resources, it would be appropriate to make use of the “passerelle clauses”, established in Article*

48 (7) TEU, to agree by qualified majority on those resources that are currently subject to unanimity, such as new taxes/levies, insofar as that prior unanimity for their entry into force was already agreed by the Council;

Or. en

Amendment 94

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 8 a (new)

Motion for a resolution

Amendment

8 a. Regrets that very little progress is registered on reducing VAT arrears, on increasing transparency, and on addressing organised crime more strongly; welcomes that digitalisation continues to be adopted in public administration, albeit at a moderate pace, with spending growing from 0.020% of GDP in 2019, to 0.022 % in 2025^{8a};

^{8a} **EPRS, PE 694.223, September 2021, 30.**

Or. en

Amendment 95

Hélène Laporte

Motion for a resolution

Paragraph 8 a (new)

Motion for a resolution

Amendment

8a. Recalls that the unanimity rule in the Council is intended to preserve the areas in which the Member States enjoy a sovereign prerogative linked to the exercise of national sovereignty;

Amendment 96
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 8 b (new)

Motion for a resolution

Amendment

8 b. Welcomes the establishment of the EU Tax Observatory; calls on the Commission to secure long-term and structural funding for this initiative at the end of the European Parliament's preparatory action;

Or. en

Amendment 97
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 8 c (new)

Motion for a resolution

Amendment

8 c. Welcomes the proposal to harmonise the withholding tax relief procedures in the Union; calls on the Commission in this respect, and in response to the recent Cum-Ex revelations and the G20/OECD global tax deal, to propose minimum effective withholding tax rates for both intra-European payments and outbound payments to third countries of dividends, royalties and interests; calls on the Commission, in this respect, to relaunch the blocked revision of the interest and royalty directive;

Or. en

Amendment 98
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 8 d (new)

Motion for a resolution

Amendment

8 d. *Notes that along the Commission's Action Plan a Communication on Tax Good Governance was published focusing on the needed reform of the EU Code of Conduct and the criteria enshrined in the EU list of non-cooperative jurisdictions; recalls in this respect the European Parliament's recommendations on both matters^{2a}; deeply deplores the standstill on both matters in Council, in particular the standstill on developing an ambitious beneficial ownership criterion in the EU list of non-cooperative jurisdictions that could serve as a proper response to the recent Pandora Papers revelations;^{3a} recalls the resolution adopted by the European Parliament as a response to the Pandora Papers revelations;*

^{2a}

https://www.europarl.europa.eu/doceo/document/TA-9-2021-0022_EN.html

^{3a}

https://www.europarl.europa.eu/doceo/document/TA-9-2021-0416_EN.html

Or. en

Amendment 99
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 8 e (new)

Motion for a resolution

Amendment

8 e. Looks forward to the revision of the directive on the structure and rates of excise duty applied to manufactured tobacco; notes the large price gaps between Member States incentivising cross-border shopping; notes further the emergence of new products, such as e-cigarettes, heated tobacco products and new addictive products; concludes the low degree of coherence of the Directive with other Union policies and the need to develop synergies; strongly supports an ambitious revision including, in particular, a significant raise of the minimum rates;

Or. en

Amendment 100

Andżelika Anna Możdżanowska

Motion for a resolution Paragraph 9

Motion for a resolution

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹;

Amendment

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸, **and that it is an unfair system given the privileged position of certain Member States in terms of freedom to set VAT rates**; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹; **calls for a system that is fair and equal for all and ensures transparency and consistency, while allowing Member States flexibility in setting VAT rates, which is particularly important in the period of economic recovery following the COVID-19 pandemic.**

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

Or. pl

Amendment 101

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Paragraph 9

Motion for a resolution

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the ***modernisation of the VAT system*** and the ***shift towards a more coherent VAT system across the Union should be addressed urgently***⁹;

⁸ As per the EPRS' EAVA (September

Amendment

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the ***Union's network of anti-fraud experts, Eurofisc, must, in order to be effective, be strengthened and provided with sufficient resources to carry out joint risk analyses, coordinate investigations and cooperate with the European Anti-Fraud Office (OLAF), Europol and the European Public Prosecutor's Office, in particular with a view to investigating VAT fraud; welcomes Transaction Network Analysis (TNA) and supports the establishment of enhanced cooperation between Eurofisc members in order to rapidly detect carousel-type fraud;***

⁸ As per the EPRS' EAVA (September

2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

Or. en

Amendment 102 **Hélène Laporte**

Motion for a resolution **Paragraph 9**

Motion for a resolution

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹;

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020,

Amendment

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹; ***even if comitology procedures were only be applied under a limited set of rules implementing the VAT Directive which require a common interpretation, this new procedure should be used only in strictly proscribed cases which do not impinge on the tax sovereignty of Member States;***

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020,

page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

Or. fr

Amendment 103

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 9

Motion for a resolution

9. Observes that the current EU VAT system remains too complex and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹;

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

Amendment

9. Observes that the current EU VAT system remains too complex, **especially for SMEs**, and vulnerable to fraud, while generating high compliance costs for economic operators⁸; notes that the different measures to tackle tax fraud are adopted in the Member States; recalls that the modernisation of the VAT system and the shift towards a more coherent VAT system across the Union should be addressed urgently⁹;

⁸ As per the EPRS' EAVA (September 2021), the VAT gap, including cross-border VAT evasion and fraud, could be estimated at around €120 billion in 2020, page 42.

⁹ As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

Amendment 104

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 9 a (new)

Motion for a resolution

Amendment

9 a. Stresses that economically relevant VAT fraud schemes are mainly driven by multinationals and wealthy individuals, through schemes such as Missing Trader Intra Community, the buying and selling of cars as they were second-hand, and air craft leasing; stresses that, according to Europol estimates, between EUR 40 billion and EUR 60 billion of the annual VAT revenue losses of Member States are caused by organised crime groups, and 2 % of those groups are behind 80 % of MTIC fraud; considers that it is necessary to focus on these issues when fighting VAT fraud;

Or. en

Amendment 105

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 9 a (new)

Motion for a resolution

Amendment

9 a. Recalls that the modernisation of the VAT system and the shift towards a more coherent and convergent VAT system across the Union should be addressed urgently^{9a}; notes that a further simplification of the VAT-system can be achieved through a further broadening of the One-Stop-Shop towards all B2C transactions of goods and the transfer of

own-stock, allowing companies to only register for VAT in one country;

^{9a} As per the EPRS' EAVA (September 2021), the estimated added value of the extended cooperation between the Member States plus the full implementation of the OSS could bring a reduction of est. €29 billion of the VAT gap, and a reduction of est. €10 billion in compliance costs for businesses, page 39.

Or. en

Amendment 106
Markus Ferber

Motion for a resolution
Paragraph 9 a (new)

Motion for a resolution

Amendment

9 a. *Welcomes the setup of the Union One-Stop Shop (OSS) that allows cross-border economic operators to fulfil VAT obligations on e-commerce sales within the Union more easily; invites the Commission to assess how to broaden the scope of the OSS to encompass a wider range of services;*

Or. en

Amendment 107
Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution
Paragraph 10

Motion for a resolution

Amendment

10. Stresses that tackling the VAT gap and tax fraud should be an urgent priority for the Union and the Member States in the

10. Stresses that tackling the VAT gap and tax fraud should be an urgent priority for the Union and the Member States in the

post-COVID-19 economy; expresses its concern about the level of the VAT gap estimated at around EUR 140 billion in 2018, whereof EUR 50 billion is related to cross-border tax evasion and fraud; notes with concern that according to the Commission's assessment, the VAT gap could rise to more than EUR 160 billion due to COVID-19;

post-COVID-19 economy; expresses its concern about the level of the VAT gap estimated at around EUR 140 billion in 2018, whereof EUR 50 billion is related to cross-border tax evasion and fraud; notes with concern that according to the Commission's assessment, the VAT gap could rise to more than EUR 160 billion due to COVID-19; ***notes that the complex composition of the VAT gap requires multiple actions, tailored to the specific parts of the drivers behind the gap;***

Or. en

Amendment 108

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. Stresses that Member States still use various criteria to determine tax residence status, creating a risk of double taxation or double non-taxation; recalls in this regard the July 2020 Commission action plan announcing a Commission legislative proposal in 2022/2023 clarifying where taxpayers that are active across borders in the Union are to be considered residents for tax purposes; looks forward to this Commission's proposal which should aim at ensuring a more consistent determination of tax residence within the Single Market;

Or. en

Amendment 109

Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. *Welcomes the identified need in the Commission's Action Plan to ensure coherence between tax policies and the European Green Deal; looks forward in this context to the proposal for reviewing VAT rates in the area of passenger transport exemptions; supports the end of exemptions for air and maritime transport; recalls, in this context, the joint statement by the Netherlands and eight other Member States in 2019 asking the Commission to come forward with an aviation tax proposal;*

Or. en

Amendment 110

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. *Stresses that the amount of VAT arrears registered for each Member State is an important driver of administrative ineffectiveness; underlines that VAT arrears would need to decrease substantially, by close to 17 percentage points, from currently 37% on average to around 20%, in order to decrease the VAT gap by one percentage point^{10a};*

^{10a} *EPRS, PE 694.223, September 2021, p. 29*

Or. en

Amendment 111

Luděk Niedermayer

Motion for a resolution
Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. *Underlines that the current VAT system remains fragmented triggering a significant administrative burden on firms, in particular for cross-border operations and SMEs, which reduces benefits of existence in the single market and also imposes costs for Member States through possible revenue losses;*

Or. en

Amendment 112

Marek Belka, Niels Fuglsang, Alfred Sant, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution
Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. *Notes that the Commission, with the new proposals, should take into account the specific needs of SMEs and create a level playing field via requirements based on threshold when relevant;*

Or. en

Amendment 113

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 10 a (new)

Motion for a resolution

Amendment

10 a. *Stresses that VAT frauds like “carrousel fraud” have a direct impact on VAT-based own resources and*

therefore the composition of EU revenue^{2a}

^{2a} *BUDG committee briefing - EU Own Resources (2020) in [https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/647459/IPOL_BRI\(2020\)647459_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/647459/IPOL_BRI(2020)647459_EN.pdf)*

Or. en

Amendment 114

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

**Motion for a resolution
Paragraph 10 b (new)**

Motion for a resolution

Amendment

10 b. Welcomes the review of the current VAT exemption on financial services, in particular following the withdrawal of the United Kingdom from the Union and the revision of the national rules in this area; stresses that the review should ensure that VAT rules on financial services are fit for current digital economy, including Fintech, and that an international level playing field is maintained for Union companies;

Or. en

Amendment 115

Claude Gruffat

on behalf of the Verts/ALE Group

**Motion for a resolution
Paragraph 10 b (new)**

Motion for a resolution

Amendment

10 b. Urges, in the framework of the ongoing negotiations on the revision of the VAT rate directive, Member States to

phase out all zero-rates and reduced rates on harmful environmental goods and services; invites equally the Council to consider the idea of increased VAT rates compared to a standard VAT rate for environmentally harmful products to achieve the Union's climate objectives;

Or. en

Amendment 116

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 10 b (new)

Motion for a resolution

Amendment

10 b. Recalls that in order to decrease the VAT gap by one percentage point, transparency would need to increase by 15 units, which for the Union on average means a move from 64 to 79 units, a substantial move towards the best performers^{2a};

^{2a} *EPRS, PE 649.223, September 2021, 29.*

Or. en

Amendment 117

Luděk Niedermayer

Motion for a resolution

Paragraph 10 b (new)

Motion for a resolution

Amendment

10 b. Welcomes the proposal of a single VAT registration aiming at simplification of tax compliance, specifically in reducing uncertainty in the single market and costs for cross-border operations, through a continued extension of the One Stop

Shop, similar to the e-commerce package;

Or. en

Amendment 118

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 10 b (new)

Motion for a resolution

Amendment

10 b. Stresses the importance of a swift exchange of information between Member States to combat tax fraud; welcomes, in this context, the proposal announced in the Commission's communication of further developing Eurofisc;

Or. en

Amendment 119

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 10 c (new)

Motion for a resolution

Amendment

10 c. Notes with concern that some Member States do not generally exempt in-kind donations from VAT, leading businesses to destroy consumer goods, notably returns, rather than donating them to charitable causes, even though such an exemption is possible under the existing VAT Directive; calls on the Commission to issue guidance to Member States, clarifying that VAT exemptions for in-kind donations are compatible with the existing Union law on VAT until Council proposal 2018 (COM(2018) 20 final, Article 98.2) is adopted by Member States;

Amendment 120
Luděk Niedermayer

Motion for a resolution
Paragraph 10 c (new)

Motion for a resolution

Amendment

10 c. Calls on the Commission to analyse and investigate the possibilities of using technology, AI and different software by applying it to real or near time VAT reporting in B2B transactions, with consideration to data protection and confidentiality; notes that the best result will be achieved if the data analysis tools are introduced and implemented within the Union single market or the standards for such reporting are set across the Union simultaneously;

Or. en

Amendment 121
José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 10 c (new)

Motion for a resolution

Amendment

10 c. Welcomes the start of operations by the European Public Prosecutor Office (EPPO) in June of 2021;

Or. en

Amendment 122
Luděk Niedermayer

Motion for a resolution
Paragraph 10 d (new)

10 d. Calls on the Commission to take steps towards a more efficient use of the Transaction network analysis (TNA) tool and focus on the quality of data provided, as it represents a key tool in tackling VAT fraud. In order to do so, the Commission should review how the TNA tool is used by the Member States and assist them in introducing guidance for best practices. In order to reduce compliance costs for taxpayers, data provided should be generated by an automated digitalised system of reporting data from the taxpayer to tax authorities^{1a} (for example by e-invoicing system referred to in annex);

^{1a} Proposal to consider abandoning the existing reporting and setting up a harmonised reporting system for cross-border transactions would allow to match transactions easier (as confirmed by the EPRS study).

Or. en

Amendment 123

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 10 d (new)

10 d. Calls on Member States to facilitate the exchange of information with judicial and law enforcement authorities such as Europol and OLAF, as recommended by the Court of Auditors;

Or. en

Amendment 124

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 10 e (new)

Motion for a resolution

Amendment

10 e. *Asks for the Commission to relaunch the discussion on a definitive VAT regime; stresses however that VAT fraud typologies are multifaceted, evolving and concern many economic sectors, possibly changing to adapt to a new legal framework; a study requested by TAX 3 in 2018^{3a} stresses that “A new type of ‘missing trader’ is therefore likely to arise under the proposed ‘definitive system’ (the seller becoming the missing trader in this case)”;*

^{3a} *LAMENSCH M. and CECI E. (2018) VAT fraud - Economic impact, challenges and policy issues, in [https://www.europarl.europa.eu/RegData/etudes/STUD/2018/626076/IPOL_STU\(2018\)626076_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2018/626076/IPOL_STU(2018)626076_EN.pdf)*

Or. en

Amendment 125

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 11

Motion for a resolution

Amendment

11. Highlights that the current global tax environment is outdated, ***and can only be fully addressed on a global level; considers that a*** multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS ***is a unique opportunity to make international tax architecture more consistent with the***

11. Highlights that the current global tax environment is outdated; ***welcomes the*** multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS ;

development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Or. en

Amendment 126

Gunnar Beck, Gerolf Annemans, Maximilian Krah, H el ene Laporte, Roman Haider

Motion for a resolution

Paragraph 11

Motion for a resolution

11. Highlights that the current **global** tax environment **is outdated, and can** only be fully addressed on a global level; considers that a multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS is a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing ***the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted*** problems related to the taxing of large multinational enterprises (MNEs);

Amendment

11. Highlights that the current tax environment ***needs to be modernised, and that some tax issues could*** only be fully addressed on a global level; considers that a multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS is a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing problems related to the taxing of large multinational enterprises (MNEs);

Or. en

Amendment 127

Lud ek Niedermayer

Motion for a resolution

Paragraph 11

Motion for a resolution

11. Highlights that the current global tax environment is outdated, and can only

Amendment

11. Highlights that the current global tax environment is outdated, and can only

be fully addressed on a global level;
considers that a multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS **is** a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

be fully addressed on a global level;
welcomes the multilateral agreement negotiated **and agreed on the** OECD/G20 Inclusive Framework on BEPS **and** a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Or. en

Amendment 128

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 11

Motion for a resolution

11. Highlights that the current global tax environment is outdated, and can only be fully addressed on a global level; considers that **a** multilateral agreement **negotiated** OECD/G20 Inclusive Framework on BEPS is a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Amendment

11. Highlights that the current global tax environment is outdated, and can only be fully addressed on a global level; considers that **the** multilateral agreement **reached at the** OECD/G20 Inclusive Framework on BEPS is a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Or. en

Amendment 129

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 11

Motion for a resolution

11. Highlights that the current global tax environment is outdated, and can only be fully addressed on a global level; considers that **a** multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS **is** a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Amendment

11. Highlights that the current global tax environment is outdated, and can only be fully addressed on a global level; considers that **the** multilateral agreement negotiated OECD/G20 Inclusive Framework on BEPS **was** a unique opportunity to make international tax architecture more consistent with the development of the economy by further addressing the distortions of fair competition in the market, which was accentuated during the COVID-19 crisis and highlighted problems related to the taxing of large multinational enterprises (MNEs);

Or. en

Amendment 130
José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 11 a (new)

Motion for a resolution

Amendment

11 a. Stresses, however, the significant loopholes that undermine the potential power of this agreement, more specifically: the carve-outs translating in a less than 15% effective minimum corporate tax rate and the fact that taxing rights are allocated to the jurisdictions where the headquarters are located, which does not respect the principle of taxing the economic activity where it happens;

Or. en

Amendment 131

José Gusmão, Manon Aubry, Martin Schirdewan

**Motion for a resolution
Paragraph 11 b (new)**

Motion for a resolution

Amendment

11 b. Calls on the Commission to pass the international agreement into Union law and to be more ambitious, by implementing a 25% minimum effective corporate tax rate;

Or. en

**Amendment 132
Luděk Niedermayer**

**Motion for a resolution
Paragraph 12**

Motion for a resolution

Amendment

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but stresses the high importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms;

deleted

Or. en

**Amendment 133
Claude Gruffat**
on behalf of the Verts/ALE Group

**Motion for a resolution
Paragraph 12**

Motion for a resolution

Amendment

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but stresses the high

deleted

importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms;

Or. en

Amendment 134

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 12

Motion for a resolution

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, **but stresses *the high importance* of the *Union in contributing to the success of global negotiations towards the ongoing necessary reforms*;**

Amendment

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives; stresses ***in particular the proposal on the fight against abusive use of shell companies; recalls that recent research by the IMF shows that two Member States (Luxembourg and the Netherlands) host nearly half of the globe's phantom Foreign Direct Investment (FDI) through empty corporate shells with zero or few employees in the host country^{4a}; calls for the definition of substance requirements to assess legal entities and to further banning them if those requirements are not met;***

^{4a} *Damgaard, J., Elkjaer, T. and Johannesen, N. (2019). What Is Real and What Is Not in the Global FDI Network?. IMF Working Paper No. 19/274. The authors find that “phantom investment into corporate shells with no substance and no real links to the local economy may account for almost 40 percent of global FDI”, and that some of countries benefiting the most from such harmful tax practices include Luxembourg and the Netherlands, as well as Ireland, Cyprus, Malta and Hungary (all of which are EU Member States).*

Or. en

Amendment 135

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 12

Motion for a resolution

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but stresses the high importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms;

Amendment

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but stresses the high importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms; **welcomes the announcement made by the Commission to implement both Pillars of the Inclusive framework via directives before the end of 2022; stresses that while the Commission's actions would not undermine the OECD initiatives, the specificities of the Union and its Single market might require an expansion of the level of ambition;**

Or. en

Amendment 136

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 12

Motion for a resolution

12. **Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but** stresses the high importance of **the Union in contributing to** the success of global negotiations towards the ongoing necessary reforms;

Amendment

12. Stresses the high importance of the success of global negotiations towards the ongoing necessary reforms;

Or. en

Amendment 137
Hélène Laporte

Motion for a resolution
Paragraph 12

Motion for a resolution

12. Welcomes the efforts of the Commission to address the problem at least partially by introducing various initiatives, but stresses the high importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms;

Amendment

12. Welcomes the efforts of the Commission **and the Organisation for Economic Co-operation and Development (OECD)** to address the problem at least partially by introducing various initiatives, but stresses the high importance of the Union in contributing to the success of global negotiations towards the ongoing necessary reforms;

Or. fr

Amendment 138
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 13

Motion for a resolution

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs;

Amendment

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs; ***stresses further that special regimes such as lower corporate income tax rates push high-income earners to incorporate avoiding progressive personal***

income taxation; notes that the corporate sector now accounts for a greater proportion of the overall economy due to a race to the bottom in corporate tax rates and the shift from personal income taxation to corporate income taxation;

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

Or. en

Amendment 139

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution

Paragraph 13

Motion for a resolution

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of

Amendment

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; ***notes the implementation of the 2019 Anti-Tax Avoidance Directive and requests the need for an evaluation report by the Commission on its impact and***

SMEs;

implementation; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs;

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

Or. en

Amendment 140

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 13

Motion for a resolution

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs;

Amendment

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs; **recalls that the tax gap due to**

corporate tax avoidance can amount up to EUR 190 billion when special tax arrangements, inefficiencies in collection and other practices are taken into account;

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

Or. en

Amendment 141
Markus Ferber

Motion for a resolution
Paragraph 13

Motion for a resolution

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill is undermining fair competition in the single market and often harming the competitiveness of SMEs;

Amendment

13. Notes that the reduction of the estimated gap¹⁰ due to corporate tax avoidance at around EUR 35 billion per year from the previous Commission estimations of EUR 50-70 billion before anti-BEPS measures were introduced and the correlation between an improvement and the legislative efforts on tax avoidance carried out by the Commission; stresses that situations where some firms are still able to reduce their tax bill ***via tax avoidance or aggressive tax planning*** is undermining fair competition in the single market and often harming the competitiveness of SMEs;

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

¹⁰ COM(2020) 312 final, page 5. There are other estimations, for example by the European Parliament, with estimated losses from financial crime, tax evasion and tax avoidance amounting to EUR 190 bn. Based on the OECD's comprehensive work in the Base Erosion Profit Shifting report (BEPS), Action 11, global revenue losses before any of the anti-BEPS measures were decided amounted to some USD 100-240 billion or 0.35 per cent of global GDP. The EU Commission estimated that some EUR 50-70 billion was attributable to the EU before the Anti-Tax Avoidance Directives I and II were agreed on by Member States.

Or. en

Amendment 142

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs, Engin Eroglu

Motion for a resolution Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the **G7/G20 levels** on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the **historic** two-pillar agreement reached at the **OECD/G20 Inclusive Framework** on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the **agreement requires all participants “to remove digital services taxes and other relevant similar measures (..) and to commit to not introducing such measures in the future”**; notes the need for effective implementation **of the two-pillar solution with the aim of ensuring a fairer distribution of profits and taxing rights among countries with respect to the largest and most profitable multinational companies**; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law

as quickly as possible after the finalisation of the technical work on the OECD approach; ***calls on the Council to swiftly adopt such proposals to have the agreement effective in 2023;***

Or. en

Amendment 143

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the need for effective implementation ***in the Union and beyond;*** calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach; ***understands that the Commission's proposal for a Digital Levy has been put on hold and demands the Commission to communicate quickly on the alternatives it is considering, also in the context of the Union's own resources;***

Or. en

Amendment 144

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the **global** profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach; ***invites the Commission to consider expanding the scope by lowering the threshold as permitted under the OECD/G20 agreement, not applying the carve-out in intra-EU situations and inserting a broad revision clause in the directive implementing the agreement;***

Or. en

Amendment 145

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

**Motion for a resolution
Paragraph 14**

Motion for a resolution

14. ***Welcomes*** the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the need for effective implementation; ***calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;***

Amendment

14. ***Takes note of*** the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of at least 15% on the global profits of MNEs; notes the need for effective implementation;

Or. en

Amendment 146

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of **at least** 15% on the global profits of MNEs; **notes the need for** effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of 15% on the global profits of MNEs; **regrets however the low level of the rate agreed, given that it had originally been set at 21%; stresses that the Union needs to undertake an** effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Or. en

Amendment 147

Martin Hlaváček, Ondřej Kovařík

Motion for a resolution

Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of **at least** 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement, **namely on PILLAR II**, into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Or. en

Amendment 148
Luděk Niedermayer

Motion for a resolution
Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of *at least* 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Or. en

Amendment 149
Andżelika Anna Możdżanowska

Motion for a resolution
Paragraph 14

Motion for a resolution

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of *at least* 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Amendment

14. Welcomes the two-pillar agreement reached at the G7/G20 levels on the allocation of taxing rights and the application of a minimum effective tax rate of 15% on the global profits of MNEs; notes the need for effective implementation; calls on the Commission to make the necessary legislative proposals to implement the agreement into Union law as quickly as possible after the finalisation of the technical work on the OECD approach;

Or. pl

Amendment 150

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 14 a (new)

Motion for a resolution

Amendment

14 a. Observes that the new working arrangements such as telework bring both challenges and opportunities for workers and employers; underlines the urgent need to better define the notion of tax residency for individuals in view of the new working arrangements that have developed rapidly due to the COVID-19 crisis; highlights that such new working arrangements can have a real impact on the collection of personal income tax, notably due to the proliferation of low tax regimes for non-residents; urges the Commission to issue proposals on the definition of tax residency by 2023;

Or. en

Amendment 151

Gilles Boyer, Stéphanie Yon-Courtin

Motion for a resolution

Paragraph 14 a (new)

Motion for a resolution

Amendment

14 a. Welcomes the fact that some Member States have pressed ahead with the introduction of national digital taxes despite ongoing negotiations at EU and OECD levels; underlines that these national measures have generated a positive pressure on international negotiations and that they make a coordinated European solution all the more pressing; stresses that these national measures should be phased out following

the implementation of an effective international solution covering the same aspects;

Or. en

Amendment 152

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 14 a (new)

Motion for a resolution

Amendment

14 a. Calls on the Union to implement a temporary excess profit tax, to tax multinational enterprises which benefited from the crisis to increase their profits;

Or. en

Amendment 153

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 14 b (new)

Motion for a resolution

Amendment

14 b. Calls on States to introduce and collect the tax deficit of multinationals: the difference between what a corporation pays in taxes globally and what this corporation would have to pay if all its profits were subject to a minimum tax rate in each of the countries where it operates; underlines that such a solution could encourage other States to follow the move and progressively lead to a global solution;

Or. en

Amendment 154

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 14 c (new)

Motion for a resolution

Amendment

14 c. Calls on the Union to implement a progressive taxation on the wealth of the richest households;

Or. en

Amendment 155

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution
Paragraph 15

Motion for a resolution

Amendment

15. Recalls that future Union policy options and political choices in the area of business taxation should be based on tax fairness, efficiency and transparency, **leading** to fairly shared taxes for all types of multinational companies, while reducing costs of compliance for taxpayers, as well as removing sources of business distortions in the Union single market, trade and investments;

15. Recalls that future Union policy options and political choices in the area of business taxation should be based on tax fairness, efficiency and transparency, **while also taking into account the need to strengthen Member States tax revenues, given the decisive role of the governments in fostering a sustainable economic recovery from the pandemic; in this sense, stresses that these policy choices should lead** to fairly shared taxes for all types of multinational companies, while reducing costs of compliance for taxpayers, **specially low-income earners and SMEs**, as well as removing sources of business distortions in the Union single market, trade and investments;

Or. en

Amendment 156

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 15

Motion for a resolution

15. Recalls that future Union policy options and political choices in the area of business taxation should be based on tax fairness, efficiency and transparency, leading to fairly shared taxes for all types of multinational companies, while reducing costs of compliance for taxpayers, as well as removing sources of business distortions in the Union single market, trade and investments;

Amendment

15. Recalls that future Union policy options and political choices in the area of business taxation should be based on **overall** tax fairness, **European Green Deal objectives**, efficiency and transparency, leading to **sustainable, redistributive and fair tax mixes and** fairly shared taxes for all types of multinational companies, while reducing costs of compliance for taxpayers, as well as removing sources of business distortions in the Union single market, trade and investments;

Or. en

Amendment 157

Gunnar Beck, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 15 a (new)

Motion for a resolution

Amendment

15 a. Underlines that according to the Commission's Annual Report on Taxation 2021, tax arrears are very unevenly distributed across the Member States^{15a}; is concerned about the fact that total year-end tax debt in Greece is well over 200% and is approaching 200% in Italy, a significant increase compared to the previous year, clearly showing severe tax compliance problems and inefficient tax payment systems in these specific countries; is shocked that the Commission did not collect information nor analyse tax arrears in individual Member States^{15b} and urges the Commission to commence this process as of this year;

^{15a} <https://op.europa.eu/en/publication-detail/-/publication/db46de2a-b785-11eb-8aca-01aa75ed71a1/language-en>, graph

23, page 50.

^{15b} Answer given by Mr Gentiloni on behalf of the European Commission to question E-003183/2021, https://www.europarl.europa.eu/doceo/document/E-9-2021-003183-ASW_EN.html

Or. en

Amendment 158

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Paragraph 15 a (new)

Motion for a resolution

Amendment

15 a. Welcomes that the Union has developed coordination mechanisms such as peer review procedures within the Code of Conduct Group (CoC); underlines that within the CoC Member States re-examine, amend or abolish their existing tax measures that constitute harmful tax competition, as well as refrain from introducing new ones in the future; welcomes in this regard the European Parliament's position from October 2021 calling for the reform of the criteria, the scope and governance of the CoC to ensure fair taxation within the Union;

Or. en

Amendment 159

Marek Belka, Niels Fuglsang, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 15 a (new)

Motion for a resolution

Amendment

15 a. Emphasises the need to balance the tax mix in order to gradually minimise the impact of labour tax on workers and to increase the contribution of

environmental taxes and fair taxes on capital;

Or. en

Amendment 160

Gunnar Beck, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 15 b (new)

Motion for a resolution

Amendment

15 b. Looks forward to the implementation of the national reform plans of Greece^{15c} and Italy^{15d}, which include wide ranging reforms and investments that are expected to improve tax collection, such as the digital transformation of companies and administrative systems in Italy and Greece's Independent Authority for Public Revenue; calls on the Commission to await the national reform plans of those few Member States who have serious issues with tax avoidance, tax evasion and inefficient tax collection before presenting legislative proposals at Union level;

^{15c} Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility, 328 final.

^{15d} COM(2021), 344 final.

Or. en

Amendment 161

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution

Paragraph 16

Motion for a resolution

Amendment

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations;

deleted

Or. en

Amendment 162

Marek Belka, Aurore Lalucq, Pedro Marques

Motion for a resolution

Paragraph 16

Motion for a resolution

Amendment

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations;

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations; ***recalls that previous attempts by the Union to define a common rulebook considered three factors: labour, assets and sales; considers that focusing on one factor would have an unbalanced impact on the tax revenues of Member States;***

Or. en

Amendment 163

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 16

Motion for a resolution

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations;

Amendment

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a ***fair, comprehensive and effective*** formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations; ***warns that a significant shift in the formula to the sales component and the value attributed to intangible assets has the potential to undermine the fairness of the proposal;***

Or. en

Amendment 164

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Paragraph 16

Motion for a resolution

16. Supports the rationale of the BEFIT, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations;

Amendment

16. Supports the rationale of the ***European Commission's proposal on BEFIT expected in 2023***, with the view to design a new and single Union corporate tax rulebook, based on a formulary apportionment and a common tax base of income taxation for businesses, which will be providing clarity and predictability for companies, reflecting the consensus reached in the OECD Pillar 1 and Pillar 2 negotiations;

Or. en

Amendment 165

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 16 a (new)

Motion for a resolution

Amendment

16 a. *Notes the idea of a stepwise implementation of unitary taxation in the Union, as a first step the formula apportionment could be applied to above-normal profits only; highlights that pillar 1 of the recent OECD/G20 agreement leads to a re-allocation of such excess profits to market jurisdictions; invites the Commission to reflect on the expansion of the OECD pillar 1 principles in the Union with lower thresholds, higher allocation and a more comprehensive formula including tangible assets and employment as an interim measure;*

Or. en

Amendment 166
Marek Belka, Aurore Lalucq, Pedro Marques

Motion for a resolution
Paragraph 16 a (new)

Motion for a resolution

Amendment

16 a. *Calls on the Commission to consider measures that would ease the implementation of the future BEFIT proposal, in particular for SMEs; suggests, in this context, a one stop shop that would complement a single consolidated tax return and a single digital platform;*

Or. en

Amendment 167
Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang

Motion for a resolution
Paragraph 17

Motion for a resolution

17. Considers, however, that the BEFIT initiative should be supported by the political process in building political support for change and that the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States;

Amendment

17. Considers, however, that the BEFIT initiative should be supported by the political process in building political support for change and that the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States; ***calls on, therefore, the Commission to initiate a wide inclusive consultation process with stakeholders, Member States, including their national parliaments, and the European Parliament;***

Or. en

Amendment 168

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 17

Motion for a resolution

17. ***Considers, however, that*** the BEFIT initiative ***should be supported by the political process in building*** political support for change ***and that*** the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States;

Amendment

17. ***Regrets the fact that previous CCTB and CCCTB proposals were not approved in the Council; looks forward to the details on*** the BEFIT initiative; ***notes that, in order to build*** political support for change, the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States;

Or. en

Amendment 169

Gunnar Beck, Gerolf Annemans, Maximilian Krah, Hélène Laporte, Roman Haider, Charlie Weimers, Jessica Stegrud

Motion for a resolution

Paragraph 17

Motion for a resolution

17. Considers, however, that the BEFIT initiative should be supported by the political process in building political support for change and that the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States;

Amendment

17. Considers, however, that the BEFIT initiative should be supported by the political process, ***including with full respect for the unanimity principle***, in building political support for change and that the initiative should be accompanied by a thorough impact assessment to shape future proposals, which should contribute to reaching a consensus between Member States;

Or. en

Amendment 170

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 17 a (new)

Motion for a resolution

Amendment

17 a. Welcomes the latest advances on the pCBCR, stressing the importance of transparent and standardised data on corporate activity, allowing for better scrutiny; regrets, however, that, in order to reach a compromise, the Council restricted the obligation for companies to publicly report information only for their operations in Member States and the countries listed in the Union's list of non-cooperative jurisdictions, ruling out third countries that in fact serve as tax havens but are not yet listed; include in the text a "corporate-get-out-clause" allowing a reporting exemption for "commercially sensitive information" which is only to be applied to companies with an annual consolidated turnover above EUR 750 million, which excludes 85 - 90 per cent of multinationals; calls for further development by the European Commission in order to advance with fully disaggregated data;

Amendment 171
Luděk Niedermayer

Motion for a resolution
Paragraph 17 a (new)

Motion for a resolution

Amendment

17 a. Emphasises that the implementation of the CCCTB (or a similar system) would bear a significant merit to reduce the scope for profit shifting by recourse of tax planning systems while decreasing compliance costs, in particular for cross-border economic operations;

Or. en

Amendment 172
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 17 a (new)

Motion for a resolution

Amendment

17 a. Commits that the FISC subcommittee in the European Parliament will develop, in dialogue with experts, national parliaments and citizens, guiding principles ahead of the BEFIT proposal by the Commission in 2023;

Or. en

Amendment 173
Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution

Paragraph 18

Motion for a resolution

18. **Considers** that the new corporate tax agenda **should include** a mechanism to address the debt-equity bias through an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future;

Amendment

18. **Notes** that the new corporate tax agenda **includes** a mechanism to address the debt-equity bias through an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future; **recalls that, in the past, allowances for corporate equity have been exploited as tax loopholes in the Union; requests the Commission to incorporate strong anti-avoidance provisions to avoid any allowance on equity to be used as a new tool for base erosion if an allowance for corporate equity should be set up; recalls that the reduction of the deduction of exceeding borrowing costs can also reduce the debt-equity bias;**

Or. en

Amendment 174

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 18

Motion for a resolution

18. **Considers that the new corporate tax agenda should include a mechanism to address the debt-equity bias through an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future;**

Amendment

18. **Recognises as a problem the debt-equity bias in the treatment of tax benefits, creating room for multinationals that engage in harmful tax practices via intra-group operations; considers that the best option to tackle it should be the limitation of interest deductions, in line with the legislative spirit already introduced by ATAD in Article 4;**

Or. en

Amendment 175

Markus Ferber

Motion for a resolution
Paragraph 18

Motion for a resolution

18. Considers that the new corporate tax agenda should include a mechanism to address the debt-equity bias through an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future;

Amendment

18. Considers that the new corporate tax agenda should include a mechanism to address the debt-equity bias through an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future **and removing incentives favouring a corporate financing model that is too reliant on debt**;

Or. en

Amendment 176
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Paragraph 18

Motion for a resolution

18. Considers that the new corporate tax agenda should include a mechanism to address the debt-equity bias through **an incentive system, helping to support the resilience of companies in adverse economic circumstances in the future**;

Amendment

18. Considers that the new corporate tax agenda should include a mechanism to address the debt-equity bias through **a revision of the first anti-tax avoidance directive and in particular the interest limitation rules**;

Or. en

Amendment 177
Gunnar Beck, Gerolf Annemans, Maximilian Krah, Roman Haider

Motion for a resolution
Paragraph 18

Motion for a resolution

18. Considers that the new corporate tax agenda should include a mechanism to

Amendment

18. Considers that the new corporate tax agenda should include a mechanism to

address the debt-equity bias through an incentive system, helping to **support** the resilience of companies in adverse economic circumstances in the future;

address the debt-equity bias through an incentive system, helping to **improve** the resilience of companies in adverse economic circumstances in the future;

Or. en

Amendment 178

José Gusmão, Manon Aubry, Martin Schirdewan

Motion for a resolution

Paragraph 18 a (new)

Motion for a resolution

Amendment

18 a. Calls on the Commission to carry out a more complete impact assessment on the DEBRA initiative, specifically showing estimates of tax revenue losses, comparing the scenario of limiting interest deduction or implementing an Allowance for Corporate Equity (ACE);

Or. en

Amendment 179

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 19

Motion for a resolution

Amendment

19. Supports, for the purposes of tax transparency, the collection of regularly updated data on the effective corporate tax rates paid by the Union's largest companies on their generated profits within the Union, such a mapping should be used to assess the efficiency of the tax framework and rules in place;

19. Supports, for the purposes of tax transparency, the collection of regularly updated data on the effective corporate tax rates paid by the Union's largest companies on their generated profits within the Union, such a mapping should be used to assess the efficiency of the tax framework and rules in place; **welcomes and looks forward to the upcoming proposal for the annual publication of the effective corporate tax rate of certain large companies with operations in the**

Union; calls on the Commission to use Article 50 TFEU as a legal basis for such a proposal amending the Directive 2013/34/EU as regards disclosure of income tax information by certain undertakings and branches;

Or. en

Amendment 180

José Manuel García-Margallo y Marfil, Isabel Benjumea Benjumea

Motion for a resolution

Paragraph 19 a (new)

Motion for a resolution

Amendment

19a. Expresses the need to continue efforts to increase administrative cooperation between Member States in order to reduce fraud and tax evasion. believes it necessary not only to increase the quantity but also to improve the quality of the data exchanged, with a view to having a more efficient system.

Or. es

Amendment 181

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Paragraph 20

Motion for a resolution

Amendment

20. Requests that the Commission submit by 2022/2023 one or more legislative proposals following the recommendations set out in the Annex hereto;

20. Requests that the Commission submit by 2022/2023 one or more legislative proposals following the recommendations set out in **this report and** the annex hereto;

Or. en

Amendment 182
Andżelika Anna Możdżanowska

Motion for a resolution
Annex I – Part A – Recommendation A2 – paragraph 1 – introductory part

Motion for a resolution

The European Parliament calls on the European Commission to introduce measures to further reduce costs and complexity of taxation of SMEs and SEs by **2023**.

Amendment

The European Parliament calls on the European Commission to introduce measures to further reduce costs and complexity of taxation of SMEs and SEs by **2024**.

Or. pl

Amendment 183
Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution
Annex I – Part B – title

Motion for a resolution

B. More certainty for taxpayers

Amendment

B. More certainty for taxpayers ***and/or Member States' tax administrations***

Or. en

Amendment 184
Andżelika Anna Możdżanowska

Motion for a resolution
Annex I – Part B – Recommendation B1

Motion for a resolution

B1 The European Parliament calls on the European Commission to bring forward initiatives to ensure a more consistent determination of tax residency within the Single Market by 2022.

The European Parliament calls on the European Commission to bring forward initiatives to ensure a more consistent

Amendment

deleted

determination of tax residency within the Single Market by 2022.

- Some taxpayers across the Union are subject to the risk of double taxation, as tax administrations do not have a consensus on a tax residence determination and consequently are subject to double taxation or uncertainty. In light of the COVID-19 crisis and consequential teleworking, further relocation from the place of work was available and the determination of tax residence became further complicated.

- As this can lead to uncertainty and significant costs for taxpayers, the proposal (possibly in the form of soft law) aiming for a consistent approach for the determination of residency among the Member States, should be introduced without delay.

Or. pl

Amendment 185

Martin Hlaváček, Ondřej Kovařík

Motion for a resolution

Annex I – Part B – Recommendation B1 – paragraph 1 – introductory part

Motion for a resolution

The European Parliament calls on the European Commission to bring forward initiatives to ensure a more consistent determination of tax residency within the Single Market by 2022.

Amendment

The European Parliament calls on the European Commission *to analyse the extent of the problem and if necessary* to bring forward initiatives to ensure a more consistent determination of tax residency within the Single Market by 2022.

Or. en

Amendment 186

Luděk Niedermayer

Motion for a resolution

Annex I – Part B – Recommendation B2 – paragraph 1

Motion for a resolution

The European Parliament calls on the Commission to reflect the experience and identify remaining gaps in the existing Council Directive (EU) 2017/1852 on tax dispute resolution mechanisms in the Union, **in order** to address the existing conflicts and uncertainties regarding residency for both natural and corporate persons, causing risks of double taxation. The regime set out **in the Directive** must ensure **the** time limits for obtaining a decision, **which** will be legally binding and enforced. **The analyses** should be done **in 2022, and a possible change of Directive presented in 2023.**

Amendment

The European Parliament calls on the Commission to reflect the experience and identify remaining gaps in the existing Council Directive (EU) 2017/1852 on tax dispute resolution mechanisms in the Union, **and propose an efficient way(s)** to address the existing conflicts and uncertainties regarding residency for both natural and corporate persons, causing risks of double taxation. The regime set out must ensure time limits, **reflecting the problems caused by dispute to taxpayers** for obtaining a decision will be legally binding and enforced. **Given the changes in the post-COVID economy, including a move to remote working, the Commission should as soon as possible assess if current legislation is sufficient to reduce the risks of double taxation for taxpayers and, if appropriate, carry out a revision of the Directive, or alternatively, propose new measures. It is also noted the Directive lacks visibility and more** should be done **by the Commission to ensure citizens are aware that this mechanism is available.**

Or. en

Amendment 187

Marek Belka, Aurore Lalucq, Pedro Marques, Jonás Fernández

Motion for a resolution

Annex I – Part B – Recommendation B2 – paragraph 1

Motion for a resolution

The European Parliament calls on the Commission to reflect the experience and identify remaining gaps in the existing Council Directive (EU) 2017/1852 on tax dispute resolution mechanisms in the Union, in order to address the existing conflicts and uncertainties regarding residency for both natural and corporate

Amendment

The European Parliament calls on the Commission to reflect the experience and identify remaining gaps in the existing Council Directive (EU) 2017/1852 on tax dispute resolution mechanisms in the Union, in order to address the existing conflicts and uncertainties regarding residency for both natural and corporate

persons, causing risks of double taxation. The regime set out in the Directive must ensure the time limits for obtaining a decision, which will be legally binding and enforced. The analyses should be done in 2022, and a possible change of Directive presented in 2023.

persons, causing risks of double taxation. The ***European Parliament also requests that the outcome of disputes should be made publicly available in the form of a summary that would publish, among other essential, but non commercially sensitive, information, the resulting effective tax rate paid by the taxpayer.*** The regime set out in the Directive must ensure the time limits for obtaining a decision, which will be legally binding and enforced. The analyses should be done in 2022, and a possible change of Directive presented in 2023.

Or. en

Amendment 188

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Annex I – Part B – Recommendation B3 a (new)

Motion for a resolution

Amendment

Recommendation B3 a

Recommendation - - Extension of automatic exchange of information

The European Parliament calls for the extension of the automatic exchange of information between Member States on further categories of income and assets such as crypto-assets (DAC8). As Member States are legally bound to send data only for those categories for which information is already available and as a consequence there is still a general lack of information concerning categories of income and assets.

Or. en

Amendment 189

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques

Motion for a resolution
Annex I – Part B – Recommendation B3 a (new)

Motion for a resolution

Amendment

Recommendation B3 a

Guidelines on positive tax incentives

calls on the Commission to issue guidelines on tax incentives that are not distortive for the Single Market. This is due to the fact that tax certainty for taxpayers and Member States would be reinforced if the latter had a common understanding of what tax incentives boost the economic performance in the Union without harming the functioning of the Single Market;

Or. en

Amendment 190
Claude Gruffat
on behalf of the Verts/ALE Group

Motion for a resolution
Annex I – Part C – title

Motion for a resolution

Amendment

C. Reduction of tax gap and compliance costs

C. Reduction of tax gap, and compliance costs ***and the European Green Deal,***

Or. en

Amendment 191
Andżelika Anna Mozdżanowska

Motion for a resolution
Annex I – Part C – Recommendation C1 – paragraph 1 – indent 1

Motion for a resolution

Amendment

- Set-up a harmonised common standard for e-invoicing across the Union ***without delay and by 2022*** to reduce the

- Set-up a harmonised common standard for e-invoicing across the Union ***by the end of 2023*** to reduce the cost of the

cost of the creation of fragmented, different system across the Member States.

creation of fragmented, different system across the Member States.

Or. pl

Amendment 192

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Annex I – Part C – Recommendation C1 – paragraph 1 – indent 1 a (new)

Motion for a resolution

Amendment

- ***Establish the role of e-invoicing in the real time reporting;***

Or. en

Amendment 193

Andżelika Anna Możdżanowska

Motion for a resolution

Annex I – Part C – Recommendation C1 – paragraph 1 – indent 2

Motion for a resolution

Amendment

- Explore the possibility of a gradual introduction of obligatory e-invoicing across the Union **by 2023**, focused on significant reduction of costs of compliance, especially for SMEs. Issuing invoices should be administered only via state-operated/certified “system(s)” with full data protection ensured.

- Explore the possibility of a gradual introduction of obligatory e-invoicing across the Union, focused on significant reduction of costs of compliance, especially for SMEs. Issuing invoices should be administered only via state-operated/certified “system(s)” with full data protection ensured.

Or. pl

Amendment 194

Luděk Niedermayer

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 1

Motion for a resolution

- Relaunch the initiative of the definitive regime as the most natural and efficient way to address tax fraud, costing a significantly large yearly loss;

Amendment

- Relaunch the initiative of the definitive regime as the most natural and efficient way to address *VAT* tax fraud, costing a significantly large yearly loss;

Or. en

Amendment 195

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 2 a (new)

Motion for a resolution

Amendment

- *Propose a further extension of the scope of the OSS through covering some of all B2C supplies of goods for which the person liable for the payment of VAT is not established in the Member State in which the VAT is due, in order to reduce the VAT administrative burden related to cross-border trade;*

Or. en

Amendment 196

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 2 b (new)

Motion for a resolution

Amendment

- *Propose a further extension of the scope of the OSS through including certain B2B supplies of services, when the services supplied are predominantly B2C services (for instance admission to sporting or entertainment events), allowing to also declare the marginal B2B supplies in the EU OSS would simplify compliance for the non-established trader providing admission to such events;*

Amendment 197

Dragoş Pîslaru, Gilles Boyer, Stéphanie Yon-Courtin, Olivier Chastel, Ivars Ijabs

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 2 c (new)

Motion for a resolution

Amendment

- ***Extend the scope of Article 196 of the VAT Directive, either by covering all services or by adding only those services for which this is considered convenient;***

Or. en

Amendment 198

Luděk Niedermayer

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 3

Motion for a resolution

Amendment

- Design and propose online reporting of data for (***at least***) cross-border Union trade, preferably by using data from e-invoicing (or from an alternative, but keeping the principle that the data must be provided once), including efficient and highly secure centralised/decentralised data processing for detection of fraud. The data will replace all existing reporting requirements in this area, and cause the overall costs of compliance to be reduced, notably for SMEs.

- Design and propose ***a standard for*** online reporting of data for (***in first instance***) cross-border Union trade, preferably by using data from e-invoicing (or from an alternative, but keeping the principle that the data must be provided once), including efficient and highly secure centralised/decentralised data processing for detection of fraud. The data will replace all existing reporting requirements in this area, and cause the overall costs of compliance to be reduced, notably for SMEs. ***Data collected should be used with due respect for confidentiality, and with consideration of all relevant data protection laws. Use of blockchain (or alternative) technology can be considered and schemes based on common Union standards could be operated by private suppliers.***

Amendment 199

Markus Ferber

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 3

Motion for a resolution

- Design and propose online reporting of data for (at least) cross-border Union trade, preferably by using data from e-invoicing (or from an alternative, but keeping the principle that the data must be provided once), including efficient and highly secure centralised/decentralised data processing for detection of fraud. The data will replace all existing reporting requirements in this area, and cause the overall costs of compliance to be reduced, notably for SMEs.

Amendment

- Design and propose online reporting of data for (at least) cross-border Union trade, preferably by using data from e-invoicing (or from an alternative, but keeping the principle that the data must be provided **only** once), including efficient and highly secure centralised/decentralised data processing for detection of fraud. The data will replace all existing reporting requirements in this area, and cause the overall costs of compliance to be reduced, notably for SMEs.

Or. en

Amendment 200

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Annex I – Part C – Recommendation C2 – paragraph 1 – indent 3 a (new)

Motion for a resolution

Amendment

- ***Issue guidance to Member States, clarifying that VAT exemptions for in-kind donations are compatible with the existing Union law on VAT.***

Or. en

Amendment 201

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution
Annex I – Part C – Recommendation C2 a (new)

Motion for a resolution

Amendment

Recommendation C2 a

Coherence VAT rates with European Green Deal

The European Parliament calls on the European Commission to:

- Come forward with a proposal for reviewing VAT rates in the area of passenger transport exemptions. Strongly supports the end of exemptions for air and maritime transport.***
- Come forward with a proposal to phase out all zero-rates and reduced rates on harmful environmental goods and services by 2030.***
- Explore the idea of increased VAT rates compared to a standard VAT rate for environmentally harmful products to achieve the Union's climate objectives.***

Or. en

Amendment 202

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Paul Tang, Jonás Fernández

Motion for a resolution
Annex I – Part C – Recommendation C2 a (new)

Motion for a resolution

Amendment

Recommendation C2 a

A Permanent observatory to monitor and quantify trends in European taxation

In 2019 the European Parliament initiated the launch of an EU Tax Observatory as a preparatory action. In order to contribute to evidence-based policy making and to stimulate a European debate on international tax

issues, the European Parliament calls on the Commission to work on a solution to perpetuate that initiative.

Or. en

Amendment 203

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Annex I – Part C – Recommendation C2 b (new)

Motion for a resolution

Amendment

Recommendation C2 b

Revision of the tobacco taxation directive

The European Parliament calls on the European Commission to:

- Come forward with the revision of the directive on the structure and rates of excise duty applied to manufactured tobacco. Notes the need to develop synergies and coherence with other Union policies and strongly supports an ambitious revision including in particular a significant raise of the minimum rates.***

Or. en

Amendment 204

Marek Belka, Niels Fuglsang, Aurore Lalucq, Pedro Marques, Jonás Fernández

Motion for a resolution

Annex I – Part C a (new)

Motion for a resolution

Amendment

C a. A new coordinated European Corporate Income Tax system

Recommendation Ca1 - Solving the Debt Equity Bias

The Commission has announced an initiative to mitigate the tax induced debt

equity bias in corporate investment decisions induced by the deductibility of interest payments on debt financing.

The European Parliament calls on the Commission to:

- include robust anti-avoidance clauses into the future Debt Equity Bias Reduction Allowance*

- consider the reduction of the deduction of exceeding borrowing costs to up to 20 % of the taxpayer's earnings before interest, tax, depreciation and amortisation (EBITDA) as another solution to reduce the debt equity bias*

Recommendation Ca2 - A single tax rulebook for the Union

In the Framework of the future Business in Europe: Framework for Income Taxation (BEFIT), the European Parliament calls on the Commission to:

- ensure different elements of what constitutes the real economic activity of firms are taken into account (sales, workforce, assets)*

- launch a wide consultation that involves Member States, national parliaments and the European Parliament*

Recommendation Ca3 - Towards a new tax mix

The European Parliament calls on the Commission to make recommendations to Member States, notably via tools such as the Country Specific Recommendations on National Plans of the Resilience and Recovery Facility in order to balance the tax mix to gradually minimise the impact of the labour tax on workers and to increase the contribution of environmental taxes and fairer taxes on capital

Recommendation Ca4 - An alternative to the Digital Levy

As the international negotiation on tax have led to a freeze of all Digital Services taxes, this will have an impact on the

announced Digital Levy. The European Parliament calls on the Commission to propose a set of alternatives that will allow generating the resources to repay Next Generation EU. Such alternatives could encompass a solidarity contribution from large firms that were not hurt by the restrictions induced by COVID-19, a Single Market Levy, a share of the future BEFIT, an excess profit tax, etc.

Or. en

Amendment 205

Claude Gruffat

on behalf of the Verts/ALE Group

Motion for a resolution

Annex I – Part C a (new)

Motion for a resolution

Amendment

C a. D.Effectiveness of tax administrations, exchange of tax information and quality of data

Recommendation D1 - Eurofisc 2.0

The European Parliament calls on the Commission to:

· Come forward with the Eurofisc 2.0 proposal.Strongly supports the framework of the Commission's suggestion to expand it to direct taxation and Eurofisc to become a Union hub for tax information serving not only VAT purposes, but also financial markets authorities, customs, OLAF and Europol.Suggests to connect this legislative initiative to the developments in the area of anti-money laundering and in particular the proposed new Union authority to fight money laundering.Reiterates the recommendations from its resolution of 16 September 2021 on the implementation of the EU requirements for exchange of tax information:progress, lessons learnt and obstacles to overcome.Notes that Eurofisc 2.0 could greatly contribute to

the effective use by tax administrations of the tax information exchanged and the quality of information exchanged.

Recommendation D2 - Public disclosure of tax information

The European Parliament calls on the Commission to:

· Come forward with the proposal for the annual publication of the effective corporate tax rates of certain large companies with operations in the Union using article 50 TFEU as a legal basis amending the Directive 2013/34/EU as regards disclosure of income tax information by certain undertakings and branches.

Recommendation D3 - harmonisation of withholding taxation

The European Parliament calls on the Commission to:

· Come forward with a proposal to harmonise the withholding tax relief procedures and rates in the Union. Suggest minimum effective withholding tax rates for both intra-European and outbound to third countries payments of dividends, royalties and interests.

· Relaunch the blocked revision of the interest and royalty directive.

Or. en

Amendment 206
Luděk Niedermayer

Motion for a resolution
Annex I a (new)

Motion for a resolution

Amendment

Recommendation - Single Harmonised Tax Return and OSS

The European Parliament calls on the

Commission to bring forward a legislative initiative:

A single and harmonised Corporate Income Tax (CIT) return to support BEFIT in the Union. A standardised approach to the content and format of the tax return could be used to simplify the preparation of the return. Such an option would contribute to simplifying the CIT reporting and to reduce the need to outsource tax compliance work, in particular for SMEs engaging in cross-border business activity.

Or. en